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11<sup>th</sup> September 2017

Dear Sir/Madam

**ECONOMIC GROWTH, ENVIRONMENT AND DEVELOPMENT (OVERVIEW AND SCRUTINY)  
COMMITTEE**

A meeting of the above mentioned Committee has been arranged to take place on **TUESDAY 19<sup>th</sup> SEPTEMBER 2017 at 6.00 PM** in the **COMMITTEE ROOM**, District Council House, Lichfield, to consider the following business.

Yours faithfully



Neil Turner BSc (Hons) MSc  
Director of Transformation & Resources

**To: Members of Economic Growth, Environment and Development (Overview and Scrutiny) Committee**

Councillors Cox (Chairman), Rayner (Vice Chairman), Drinkwater (Vice Chairman) Awty, Mrs Baker, Mrs Eagland, Mrs Evans, Mrs Fisher, Marshall, Smedley and Mrs Stanhope MBE



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MyStaffs App

## AGENDA

1. Apologies for absence
2. Declarations of Interest
3. To approve as a correct record the Minutes of the previous meeting held on 20<sup>th</sup> June 2017 (copy attached)
4. Work Programme (copy attached)
5. Brownfield Register (copy attached)
6. Delivering the Local Plan (copy attached)
7. Local Plan – Land Allocations (copy attached)
8. Rugeley Power Station SPD consultation (copy attached)

RESOLVED: "That as publicity would be prejudicial to the public interest by reason of the confidential nature of the business to be transacted, the public and press be excluded from the meeting for the following items of business, which would involve the likely disclosure of exempt information as defined in Paragraph 3 of Part 1 of Schedule 12A of the Local Government Act 1972"

### IN PRIVATE

9. To approve as a correct record the Minutes of the previous meeting held on 20<sup>th</sup> June 2017 (copy attached)

Briefing Papers to be issued separately:

HS2

**ECONOMIC GROWTH, ENVIRONMENT & DEVELOPMENT  
(OVERVIEW AND SCRUTINY) COMMITTEE  
20 JUNE 2017**

**PRESENT**

Councillors Cox (Chairman), Rayner (Vice-Chairman) Drinkwater (Vice-Chairman) Awty, Mrs Eagland, Mrs Fisher, Marshall and Smedley.

(In accordance with Council Procedure Rule No.17 Councillors Miss Hassall, Pritchard and Wilcox attended the meeting).

**APOLOGIES FOR ABSENCE** were received from Councillors Mrs Baker and Mrs Stanhope.

**DECLARATIONS OF INTEREST:**

Councillors Drinkwater and Smedley declared Personal Interests in Agenda Item 6 (Evening and Sunday Car Parking Charges) as relatives of blue badge holders.

**MINUTES:**

**RESOLVED:** That the Minutes of the previous meetings held on 29 March 2017 as circulated were approved as a correct record and signed by the Chairman.

**TERMS OF REFERENCE**

Consideration was given to the Committee's Terms of Reference.

**RESOLVED:** That the Committee's Terms of Reference be noted.

**WORK PROGRAMME**

The Committee reviewed its work programme for 2017/18.

It was confirmed that 'barriers to growth' would be looked at as part of the delivery of the Local Plan.

In response to a question about the workload in Planning Services it was advised that both staffing levels and processes were currently being reviewed.

Protecting the District's heritage assets was highlighted as a priority and it was noted that there was a considerable amount to learn in connection with this issue and further training could be beneficial.

Further to the tragic fire at Grenfell Tower in London the Committee was advised that the Council had met with Bromford Housing to ensure that appropriate action had been taken in the District.

The Chairman invited Members to contact him if they had further items for the Work Programme, noting that the Programme would be kept as flexible as the Committee required.

**RESOLVED:** That the Work Programme be noted and any further items be forwarded to the Chairman.

**EXCLUSION OF PUBLIC AND PRESS**

**RESOLVED:** “That as publicity would be prejudicial to the public interest by reason of the confidential nature of the business to be transacted, the public and press be excluded from the meeting for the following items of business, which would involve the likely disclosure of exempt information as defined in Paragraph 3 of Part 1 of Schedule 12A of the Local Government Act 1972”

**IN PRIVATE**

**EVENING AND SUNDAY CAR PARKING CHARGES**

Consideration was given to a report on evening and Sunday car parking charges.

**TOURIST INFORMATION SERVICE RELOCATION**

The Committee received a report in connection with the Relocation of the Tourist Information Centre.

(The Meeting Closed at 7.05 pm)

CHAIRMAN

**ECONOMIC GROWTH, ENVIRONMENT AND DEVELOPMENT (OVERVIEW AND SCRUTINY) COMMITTEE WORK PROGRAMME FOR 2017-18**

| Item   | Jun | Sept | Jan | Mar | Details/Reasons   | Link to 2017/18 One Year Action Plan | Officer            | Member Lead        |
|--|-----|------|-----|-----|---|--------------------------------------|--------------------|--------------------|
| <b>Policy Development</b>  |     |      |     |     |   |                                      |                    |                    |
| Terms of Reference   | ✓   |      |     |     |   |                                      | Christine Lewis    |                    |
| Tourist Information service - relocation of Tourist Information Centre | ✓   |      |     |     | To consider issues relating to the relocation of the Council's TIC - Confidential Item  |                                      | Elizabeth Thatcher |                    |
| Car Parking Strategy review  |     |      | ✓   |     | Via a task group, review proposed potential changes to the service including evening and Sunday charging and success of Check in and Check Out trial. |                                      | John Roobottom     | Cllr Ian Pritchard |
| Local Plan – Formulating the Land Allocations Document                 |     | ✓    | ✓   | ✓   | Reports on progress with the Local Plan Land Allocations Document. Note: Local Plan matters are a standing item for the Committee                     |                                      | Ashley Baldwin     | Cllr Ian Pritchard |

**ECONOMIC GROWTH, ENVIRONMENT AND DEVELOPMENT (OVERVIEW AND SCRUTINY) COMMITTEE WORK PROGRAMME FOR 2017-18**

| <b>Item</b>  | <b>Jun</b> | <b>Sept</b> | <b>Jan</b> | <b>Mar</b> | <b>Details/Reasons</b>  | <b>Link to 2017/18<br/>One Year Action Plan</b> | <b>Officer</b>              | <b>Member Lead</b> |
|--|------------|-------------|------------|------------|---|---|-----------------------------|--------------------|
| Implementing the Local Plan – preparation of planning guidance for the former Rugeley Power Station Site |            | ✓           |            |            | To consider proposed planning guidance to inform the formulation and assessment of proposals for the former Rugeley Power Station site which straddles the Cannock and Lichfield Council's boundary |   | Ashley Baldwin/Sarah Matile | Cllr Ian Pritchard |
| Public Realm Friarsgate  |            |             | ✓          |            | For the task group to continue its work   |   | Sarah Woffenden             | Cllr Ian Pritchard |
| Protecting the district's Heritage Assets  |            |             |            | ✓          | To review how the number of heritage assets on the 'at-risk' register could be reduced.   |   | Claire Hines                | Cllr Ian Pritchard |
| Barriers to Growth – reviewing the period between the planning approval and delivery                     |            | ✓           |            |            | To consider the council's approach to encouraging approved planning applications to be delivered in a more timely manner.   |   | Craig Jordan/Sean Coghlan   | Cllr Ian Pritchard |

**ECONOMIC GROWTH, ENVIRONMENT AND DEVELOPMENT (OVERVIEW AND SCRUTINY) COMMITTEE WORK PROGRAMME FOR 2017-18**

| <b>Item</b>                                 | <b>Jun</b> | <b>Sept</b> | <b>Jan</b> | <b>Mar</b> | <b>Details/Reasons</b>  | <b>Link to 2017/18<br/>One Year Action Plan</b> | <b>Officer</b>    | <b>Member Lead</b> |
|---|------------|-------------|------------|------------|---|---|-------------------|--------------------|
| Review of the Economic Development Strategy |            |             |            | ✓          | To measure progress and to review impact.                             |   | Jonathan Percival | Cllr Ian Pritchard |
| Development of a Brownfield Register        |            | ✓           |            |            | To consider the development of a Brownfield Register for the District |   | Ashley Baldwin    |                    |

Briefing papers:

- High Speed 2 – September 2017
- GBSLEP Planning Guidance – September 2017
- Economic Development Performance Update – January 2018
- Development Management Update – January 2018
- Performance Reports – on-going

# Brownfield Land Register

Cabinet Member: Councillor I. Pritchard

Date: 19<sup>th</sup> September 2017

Agenda Item: 5

Contact Officer: Patrick Jervis/ Ashley Baldwin

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Key Decision? **NO**

Local Ward  
Members



**Economic Growth,  
Environment and  
Development (Overview  
and Scrutiny)  
Committee**

## 1. Executive Summary

- 1.1 The Town and Country Planning (Brownfield Land Register) Regulations 2017 came into force on the 16 April 2017 and require all Local Planning Authorities to produce and publish a 'Part 1' Brownfield Land Register (BLR) by 31 December 2017. The BLR is to be split into two parts, with 'Part 1' being a register of all brownfield sites considered to be 'suitable' for residential development and 'Part 2' identifying any such sites which are to be granted Permission in Principle (PiP). Presently authorities are not obliged to produce a 'Part 2' BLR.
- 1.2 A draft of the BLR Part 1 for Lichfield District has now been prepared for consideration prior to its publication on the District Councils website. At this time no BLR Part 2 is proposed to be produced, however, officers will continue to maintain the BLR and review whether a Part 2 BLR should be produced in future years.

## 2. Recommendations

- 2.1 The Economic Growth, Environment and Development Overview and Scrutiny Committee notes the draft Lichfield District Council Brownfield Land Register (Part 1) and provides any relevant comments/views on the content of the document (**Appendix A**).
- 2.2 That the Economic Growth, Environment and Development Overview and Scrutiny Committee recommends that Cabinet approve the proposed Lichfield District Council Brownfield Land Register for publication.

## 3. Background

- 3.1 The National Planning Policy Framework (NPPF) through its core principles states that planning policies and decisions should encourage the effective use of land by reusing brownfield sites (or previously developed land (PDL)), provided they are in sustainable locations and not of high environmental value. A position which is further supported through the governments National Planning Practice Guidance (PPG). Government has made a commitment to maximise the number of homes delivered on suitable brownfield sites and has now introduced the brownfield register as a tool to assist in delivering this.
- 3.2 The adopted Local Plan Strategy also acknowledges the importance of brownfield sites in delivering the housing requirement for Lichfield District with Core Policy 6 seeking the delivery of 70% homes on Brownfield sites to 2018 and 50% thereafter.
- 3.3 The NPPF defines brownfield sites or PDL as:



*“Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time”*

- 3.3 The requirement for all Local Planning Authorities to produce a ‘Brownfield Land Register’ came into force on 16 April 2017 through the Town and Country Planning (Brownfield Land Register) Regulations 2017. This requires Local Planning Authorities to maintain and publish a register of brownfield land that is ‘suitable’ for residential development. The Brownfield Land Register (BLR) is to be split into two parts with ‘Part 1’ being a register of all brownfield sites which are considered to be suitable for housing and ‘Part 2’ identifying any such sites which are then to be granted Permission in Principle (PiP). PiP is an alternative way of obtaining planning permission which separates the consideration of matters of principle for the proposed development from the technical detail. PiP establishes whether a site is suitable in-principle for residential development without consideration of the more detailed technical matters which are subsequently addressed through ‘technical details consent’ once PiP has been granted. For a site to be entered onto Part 2 of the register, and as such be granted PiP, a significant level of detail would need to be provided for each individual site to establish the principle matters of the development. Presently such information is not available as such no Part 2 register is proposed.
- 3.4 The government updated the National Planning Practice Guidance (PPG) on 28 July 2017 and introduced guidance for both BLR (and PiP). Alongside the guidance the Department for Communities and Local Government (DCLG) published the ‘Brownfield Land Register Data Standard: Preparing and publishing a register’. The data standard document provides clear and exact guidance on the format and content of information which must be included on an authorities BLR to ensure that information is comparable across all authorities.
- 3.4 The draft Part 1 BLR for Lichfield District has been produced following the methodology devised and set out within the document (**Appendix A**). This methodology has been devised to comply with the regulations and national guidance. The Part 1 BLR data table (**Appendix B**) has been produced following the Brownfield Land Register Data Standard to ensure that the data captured meets the government’s requirements and can be published as part of the open data agenda.
- 3.5 For a site to be entered onto the Part 1 BLR it is required to meet certain criteria contained within the regulations and guidance. Those sites must meet the definition of previously developed land as described at paragraph 3.3 of this report and be of at least 0.25 hectares in size or capable of delivering 5 or more dwellings. Further to this criteria the site must be considered to be ‘suitable’ for residential development and be both ‘available’ and ‘achievable’. With regards to suitability an assessment is made as to whether the site offers a suitable location for development having regard to adopted national and local planning policy, as well as emerging planning policy contained within the Local Plan Allocations document. Of those sites considered to be suitable an assessment is then made as to the availability of the site and the achievability of residential development being delivered. This process of assessment has benefitted from the significant information collected through the evidence base for the Local Plan.
- 3.6 The Part 1 BLR as set out at table 1 of **Appendix A** and **Appendix B** identifies those previously developed sites which have been assessed and considered as suitable, available and achievable for residential development. In total 45 sites have been identified and included on the Part 1 BLR, this includes a range of sites in terms of size, location and their current planning status. A majority of the sites identified currently benefit from an extant planning permission and/or have been allocated for development

through the Local Plan Strategy. Additionally a number of the sites included on the Part 1 BLR have been proposed for allocation through the emerging Local Plan Allocations document.

3.7 The Part 1 BLR recommends that at this time a Part 2 register is not produced. Through the ongoing maintenance and annual updating of the Part 1 BLR officers will consider whether a Part 2 register be produced in future years. The production of a Part 2 BLR in future years may present the Council with the opportunity to further promote specific brownfield sites within the District.

|   |   |
|---|---|
| <b>Alternative Options</b>                                | <ol style="list-style-type: none"> <li>1. The Committee declines to publish the BLR Part 1 document. However, legislation requires all Local Planning Authorities to publish and maintain BLR's with publication being no later than 31 December 2017.</li> </ol>   |
| <b>Consultation</b>                                       | <ol style="list-style-type: none"> <li>1. Consultation is not required on the BLR Part 1 document.</li> <li>2. In future years if a BLR Part 2 is progressed this will be subject to consultation as is set out within the Town and Country Planning (Brownfield Land Register) Regulations 2017.</li> </ol>  |
| <b>Financial Implications</b>                             | <ol style="list-style-type: none"> <li>1. Funding has been made available via national government to Local Authorities to meet the burdens associated with introducing Brownfield Land Registers.</li> <li>2. The costs of production and maintenance of the BLR will be met within approved budgets.</li> </ol>  |
| <b>Contribution to the Delivery of the Strategic Plan</b> | <ol style="list-style-type: none"> <li>1. Supports the priority of a vibrant and prosperous economy as it assists in the delivery of the new housing and reuse of previously developed sites.</li> <li>2. Supports the priority of a Healthy and Safe communities by ensuring the provision of housing.</li> <li>3. Supports the priority of clean, green and welcoming places to live by assisting in the delivery of residential developments of previously developed sites.</li> </ol> |
| <b>Equality, Diversity and Human Rights Implications</b>  | <ol style="list-style-type: none"> <li>1. An Equality Impact Assessment was produced to accompany the adopted Local Plan Strategy and the Local Plan Allocations document. For a site to be included on the brownfield register it should be considered to be in conformity with the adopted Local Plan Strategy and therefore any such implications for Equability, Diversity and Human Rights have previously been considered.</li> </ol>   |
| <b>Crime &amp; Safety Issues</b>                          | <ol style="list-style-type: none"> <li>1. None.</li> </ol>  |

|   | <b>Risk Description</b>  | <b>How We Manage It</b>  | <b>Severity of Risk (RYG)</b> |
|---|--|--|-------------------------------|
| A | It is not agreed to publish the Brownfield Land Register as is required by legislation. This would mean a register is not published by the 31 December 2017 as is required by legislation. | Proceed to agree approach to taking forward the Brownfield Land Register before the legislative deadline.        | Yellow                        |
| B | Alternative sites are recommended to be included on the Brownfield Land Register.  | An evidence based assessment of alternative sites to ascertain whether sites should be included on the register. | Yellow                        |

|   |  |   |        |
|---|--|---|--------|
| C | Sites are recommended to be removed from the Brownfield Land Register. | An evidence based assessment of alternative sites to ascertain whether sites should be removed from the register. | Yellow |
|---|--|---|--------|

### Background documents:

Local Plan Strategy 2015

The Town and Country Planning (Brownfield Land Register) Regulations 2017

National Planning Practice Guidance – Brownfield Land Registers

### Relevant web links:

**Local Pan Strategy 2015** - <https://www.lichfielddc.gov.uk/Council/Planning/The-local-plan-and-planning-policy/Local-plan/Local-Plan-Strategy.aspx>

**The Town & Country Planning (Brownfield Land Register) Regulations 2017** - [http://www.legislation.gov.uk/uksi/2017/403/pdfs/uksi\\_20170403\\_en.pdf](http://www.legislation.gov.uk/uksi/2017/403/pdfs/uksi_20170403_en.pdf)

**National Planning Policy Framework**

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/6077/2116950.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf)

**National Planning Practice Guidance – Brownfield Land Registers** - <https://www.gov.uk/guidance/brownfield-land-registers>

**National Planning Practice Guidance – Permission in Principle** - <https://www.gov.uk/guidance/permission-in-principle>

**Brownfield Land Registers Data Standard: Preparing and publishing a register (DCLG)** -

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/633593/BrownfieldLandRegisters-DataStandard.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/633593/BrownfieldLandRegisters-DataStandard.pdf)

**Lichfield District Council**  
**Brownfield Land Register (Part 1)**

**August 2017**



Prepared by Lichfield District Council

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## **2.0 Introduction**

2.1 Brownfield land has an important role to play in meeting the country's need for new homes. The National Planning Policy Framework (NPPF) sets out through its core principles that planning policies and decisions should encourage the effective use of land by reusing brownfield sites. This is further supported through the governments National Planning Practice Guidance (PPG). The Government has made a commitment to maximising the number of homes delivered on suitable brownfield land and sees the production of statutory brownfield registers as being a key component to deliver this.

2.2 The adopted Lichfield District Local Plan Strategy (February 2015) also places importance on the use of brownfield land in delivering the Districts development requirements. As such the production of a brownfield register will also assist the District Council in delivering the aims of the Local Plan.

2.3 The requirement for all Local Planning Authorities to produce a 'Brownfield Land Register' came into force on 16 April 2017 through the Town and Country Planning (Brownfield Land Register) Regulations 2017. This requires Local Planning Authorities to maintain and publish a register of brownfield land that is 'suitable' for residential development. The Brownfield Land Register (BLR) is to be split into two parts with 'Part 1' being a register of all brownfield sites which are considered to be suitable for housing and 'Part 2' identifying any such sites which are then to be granted Permission in Principle (PiP). The Town and Country Planning (Permission in Principle) Order 2017 states that any sites entered into Part 2 of the brownfield register will be granted permission in principle.

2.4 This document represents the Brownfield Land Register (Part 1) for Lichfield District Council. All Local Planning Authorities are required by legislation to produce and publish a Part 1 register by 31 December 2017. Presently Lichfield District Council is not proposing to produce a Part 2 Brownfield Land Register. This will be reviewed on an annual basis alongside the Part 1 Register.

2.5 The government updated the National Planning Practice Guidance (PPG) on 28 July 2018 and introduced guidance for both BLR and PiP. Alongside the guidance the Department for Communities and Local Government (DCLG) published the 'Brownfield Land Register Data Standard: Preparing and publishing a register'. The data standard document provides clear and exact guidance on the format and content of information which must be included on an authorities BLR to ensure that information is comparable across all authorities. The guidance within the PPG provides further detail on the role and purpose of the BLR along with information on how to update and maintain the register. The Lichfield District BLR has been produced taking account of this guidance and is consistent with the Governments data standard.

## **3.0 Identification of sites for the register**

3.1 The PPG makes clear that for the purposes of the BLR the NPPF definition of previously developed land is used:

*"Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built up areas such as private residential gardens, parks, recreation grounds and allotments; and land*

*that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time”*

3.2 The regulations and guidance require that all sites considered ‘suitable for residential development’ are included on BLR Part 1. Regulation 5 provides clarity and states that all land which falls within the description in paragraph 1(a) of regulation 3 and meets the criteria in paragraph 1 of regulation 4. In effect this means sites within the local planning authority area which are at least 0.25 hectares in size or capable of delivering 5 or more dwellings are suitable and available for residential development and that development is considered achievable. The regulations then further define what is meant by the terms ‘suitable’, ‘available’ and ‘achievable’. In order to identify sites for inclusion on the BLR the following methodology has been drafted. The methodology is based upon the regulations and experiences of BLR pilot authorities.

3.3 The identification of sites will be undertaken in the following stages:

- Stage 1: Identification of potential brownfield sites;
- Stage 2: Assessing suitability of sites;
- Stage 3: Assessing availability & achievability of sites; and
- Stage 4: Schedule of sites for BLR.

Explanation for each stage is outlines below.

### **Stage 1: Identification of potential brownfield sites**

3.4 Potential sites will be drawn from a number of existing sources of data which are held and published by Lichfield District Council. All potential sites must first meet the definition of previously developed land as set out within Annex 2 of the NPPF and be located within the Lichfield District administrative area. Potential sites will be identified from the following sources:

- Sites with extant planning permission for residential development (including sites with a resolution to grant planning permission for residential development) as published within the councils suite of monitoring documents;
- Allocations and broad locations for residential development as set out within the adopted Local Plan Strategy and ‘made’ neighbourhood development plans;
- Emerging allocations for residential development within the District Councils emerging development plan documents and emerging neighbourhood plans;
- Sites contained within the latest published Strategic Housing Land Availability Assessment (SHLAA); and
- Sites submitted through the Councils ‘Call for Sites’ and representations made through the local plan process to the base date set out within the latest published SHLAA (August 2017). For the purposes of this initial BLR sites submitted through the Call for Sites process up to the date of publication have been considered through the four stage process outlined above.

3.5 After the initial identification of sites from the above sources an initial filtering process was undertaken which removed sites which were smaller than 0.25 hectares and/or not capable of delivering five or more dwellings<sup>1</sup>. Also removed at this stage were sites from all sources which were greenfield (or predominantly greenfield) and sites

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<sup>1</sup> The Lichfield District Strategic Housing Land Availability Assessment (SHLAA) includes a number of assumptions used to determine the potential capacity of a site. These same assumptions will be used for the identification with a 10% variance both above and below the SHLAA figure to provide an approximate minimum and maximum yield.

proposed for mixed use developments, where residential is not the primary land use. Such sites are therefore beyond the scope of the BLR.

3.6 Following Stage 1, 83 sites were identified to be progressed to stage 2 of the methodology.

## **Stage 2: Assessing the suitability of sites**

3.7 Those sites identified through stage 1 are then reviewed to determine whether sites are considered to be suitable for residential development. The regulations and guidance define land which is suitable for residential development as the following:

- Allocated sites;
- Sites with planning permission;
- Sites with grant of permission in principle; and
- Sites the LPA considers appropriate for residential development.

### *Allocated sites*

3.8 Sites which are allocated within the Local Plan Strategy and 'made' neighbourhood plans for residential development are considered to be suitable where they have passed through stage 1 of the BLR process. For the purposes of the Lichfield District BLR sites which are identified for allocation within the emerging local plan allocations document are considered suitable as they have been assessed through the plan making process.

### *Sites with planning permission*

3.9 Where a site benefit from planning permission for residential development it will be considered to be suitable. These sites are by definition suitable for residential development, as they have been subject to detailed testing through the decision making process.

### *Sites with permission in principle*

3.9 Any site which has grant of permission in principle for residential development would be considered to be suitable. It should be noted that no such sites are identified.

### *Sites the LPA considers appropriate for residential development*

3.10 The regulations allow authorities to consider additional sites which are appropriate for residential development having regard to; any adverse impact on the natural environment; the local built environment including in particular on heritage assets; any adverse impact upon the local amenity; and relevant representations received.

3.11 Sites from the SHLAA which have been identified through stage 1 were then assessed to ascertain if they were considered appropriate for residential development taking into account information within the SHLAA and the adopted Local Plan. The SHLAA classifies sites as 'deliverable', 'developable' and 'not developable'. It must be noted that the Lichfield District Council SHLAA applies a 'policy off' approach to site assessment as such sites are not discounted based upon planning policies.

3.12 Those assessed as 'Not developable' are rejected as the SHLAA has assessed them as unsuitable for residential development. Sites which are assessed as 'deliverable' or 'developable' were then considered in the context of adopted local and national planning policy. The Local Plan Allocations (LPA) document is at an advanced stage and as such



some weight can be applied to its policies. Therefore sites were also considered in the context of the emerging planning policy. Where sites are not considered to comply with current and emerging planning policy then they are rejected at this stage (**Appendix A** details all such sites). For example sites are not discounted within the SHLAA if they are in the Green Belt, where such a site is assessed through stage 2 of the BLR process it is considered to be unsuitable for housing development.

3.13 Following stage 3, 78 sites are assessed as being 'suitable' and progressed to Stage 3 of the assessment.

### **Stage 3: Assessing availability & achievability of sites**

3.14 Those sites which have passed through stage 2 are then assessed in terms of availability and achievability. The detailed SHLAA methodology includes the process for assessing a sites availability and achievability. Where a site has been assessed as being available and achievable within the most recent iteration of the SHLAA then it is assumed that this remains the case for the BLR.

3.15 Where sites have the benefit of planning permission (or are under construction) or are allocated for residential development it is assumed the sites are available and achievable, unless information has been provided to the contrary.

3.16 Additional information has been collected by the District Council through the [Urban Capacity Assessment](#) (UCA) which was published in 2016. This provided a detailed assessment of potential sites within the Districts built-up areas, particularly with regards to the availability of sites for residential development.

3.17 Sites which are discounted at this stage are detailed at **Appendix B**.

### **Stage 4: Schedule of sites for BLR**

3.18 Sites which have passed through the stages (as outlined above) and are considered to be suitable (in line with current planning policy), available and achievable are included on the Lichfield District Part 1 BLR is detailed at Table 1 (below). The full BLR can be downloaded and viewed via the attached excel document. There are 45 sites on the Part 1 BLR.

3.19 The information for each site is as set out within the Brownfield Land Register Regulations 2017, with maps of each site contained at **Appendix C**.

3.20 There is not Part 2 Brownfield Register for Lichfield District.

**Table 1: BLR sites summary (for full BLR please see attached excel document)**

| BLR site reference | SHLAA reference | Site name  | Site size | Planning Status                      | Potential yield of dwellings | Map reference (Appendix C) |
|--------------------|-----------------|--|-----------|--------------------------------------|------------------------------|----------------------------|
| LDC-BLR-1          | 1               | Lichfield Highway Depot, Trent Valley Road, Lichfield                          | 1.37      | Not permitted                        | 52-57                        | BLR-01                     |
| LDC-BLR-2          | 4               | Land rear Chase Terrace Primary School, Rugeley Road, Burntwood                | 1.56      | Permitted (Full planning permission) | 12                           | BLR-02                     |
| LDC-BLR-3          | 7               | Maple Close/Sycamore Road, Burntwood   | 1.33      | Not permitted                        | 29-35                        | BLR-03                     |
| LDC-BLR-4          | 8               | Whittington Youth Centre, Main Street, Whittington                             | 0.32      | Not permitted                        | 7-9                          | BLR-04                     |
| LDC-BLR-5          | 9               | Minster Hall Youth Centre, Lichfield   | 0.15      | Not permitted                        | 13-17                        | BLR-05                     |
| LDC-BLR-6          | 30              | Shenstone Business Park and Birchbrook Industrial Estate, Lynn Lane, Shenstone | 2.09      | Not permitted                        | 45-55                        | BLR-06                     |
| LDC-BLR-7          | 31              | Former Lichfield Tennis Club, Birmingham Road, Lichfield                       | 0.45      | Not permitted                        | 16-20                        | BLR-07                     |
| LDC-BLR-8          | 39              | Former Integra/Hepworth, Eastern Avenue, Lichfield                             | 2.8       | Permitted (Full planning permission) | 99                           | BLR-08                     |
| LDC-BLR-9          | 44              | St Chads House, Cross Keys, Lichfield  | 0.15      | Permitted (Full planning permission) | 12                           | BLR-09                     |
| LDC-BLR-10         | 46              | Former Park Road Printers, Park Road, Alrewas                                  | 0.25      | Permitted (Full planning permission) | 6                            | BLR-10                     |
| LDC-BLR-11         | 51              | Packington Hall, Tamworth Road   | 2.31      | Permitted (Full planning permission) | 24                           | BLR-11                     |
| LDC-BLR-12         | 52              | Auction centre and land at Quonians Lane, Lichfield                            | 0.81      | Not permitted                        | 42-52                        | BLR-12                     |
| LDC-BLR-13         | 54              | Former Regal Cinema, Tamworth Street, Lichfield                                | 0.16      | Permitted (Full planning permission) | 38                           | BLR-13                     |
| LDC-BLR-14         | 60              | Angel Croft Hotel, Beacon Street, Lichfield                                    | 0.27      | Permitted (Full planning permission) | 8                            | BLR-14                     |
| LDC-BLR-15         | 61              | The Windmill, Grange Lane, Lichfield   | 0.31      | Not permitted                        | 11-13                        | BLR-15                     |

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| BLR site reference | SHLAA reference | Site name   | Site size | Planning Status   | Potential yield of dwellings | Map reference (Appendix C) |
|--------------------|-----------------|---|-----------|---|------------------------------|----------------------------|
| LDC-BLR-16         | 63              | Land rear The Greyhound, Upper St John Street, Lichfield                          | 0.15      | Permissioned (Full planning permission)                               | 8                            | BLR-16                     |
| LDC-BLR-17         | 64              | Former Nursery, 41 Cherry Orchard, Lichfield                                      | 0.25      | Permissioned (Full planning permission)                               | 7                            | BLR-17                     |
| LDC-BLR-18         | 119 (part)      | Mount Road Industrial Estate (part), Mount Road, Burntwood                        | 2.77      | Permissioned (Outline planning permission subject to signing of s106) | 96                           | BLR-18                     |
| LDC-BLR-19         | 146             | 114 High Street, Chasetown, Burntwood   | 0.33      | Permissioned (Full planning permission)                               | 8                            | BLR-19                     |
| LDC-BLR-20         | 152             | The Greyhound, Boney Hay Road, Burntwood  | 0.54      | Permissioned (Full planning permission)                               | 27                           | BLR-20                     |
| LDC-BLR-21         | 156             | Former Acorn Garage, Queen Street, Chasetown, Burntwood                           | 0.24      | Permissioned (Full planning permission)                               | 14                           | BLR-21                     |
| LDC-BLR-22         | 157             | Rugeley Canal Side, Rugeley Road, Rugeley   | 1.8       | Permissioned (Full planning permission)                               | 54                           | BLR-22                     |
| LDC-BLR-23         | 164             | Land adjacent 84 Cherry Orchard, Lichfield  | 0.1       | Not permissioned  | 8-10                         | BLR-23                     |
| LDC-BLR-24         | 167             | 1-3 Hill Street, Chasetown, Burntwood   | 0.12      | Permissioned (Full planning permission)                               | 7                            | BLR-24                     |
| LDC-BLR-25         | 255             | Former Royal Oak, Uttoxeter Road, Hill Ridware                                    | 0.23      | Permissioned (Full planning permission)                               | 9                            | BLR-25                     |
| LDC-BLR-26         | 415             | Trent Valley Buffer Depot, Trent Valley Road, Lichfield                           | 1.9       | Not permissioned  | 45-75                        | BLR-26                     |
| LDC-BLR-27         | 418             | Beaconsfield House, Sandford Street, Lichfield                                    | 0.05      | Not permissioned  | 24-30                        | BLR-27                     |
| LDC-BLR-28         | 425             | Hawthorn House, Burton Old Road, Lichfield  | 0.6       | Permissioned (Full planning permission)                               | 26                           | BLR-28                     |
| LDC-BLR-29         | 426             | Fradley Strategic Development Allocation (SDA), land off Gorse Lane, Fradley Park | 12.0      | Not permissioned  | 250-300                      | BLR-29                     |
| LDC-BLR-30         | 428             | Former Children's Home, Scotch Orchard, Lichfield                                 | 0.97      | Permissioned (Full planning permission)                               | 27                           | BLR-30                     |

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| BLR site reference | SHLAA reference | Site name   | Site size | Planning Status  | Potential yield of dwellings | Map reference (Appendix C) |
|--------------------|-----------------|---|-----------|--|------------------------------|----------------------------|
| LDC-BLR-31         | 429             | Cottage of Content, Queen Street, Chasetown, Burntwood                                    | 0.24      | Not permitted  | 9-11                         | BLR-31                     |
| LDC-BLR-32         | 478             | Former Bridge Cross Garage, Bridge Cross Road, Burntwood                                  | 0.34      | Permitted (Full planning permission)                               | 8                            | BLR-32                     |
| LDC-BLR-33         | 497             | East of Burntwood Bypass Strategic Development Allocation (SDA), Milestone Way, Burntwood | 10.5      | Permitted (Full planning permission)                               | 351                          | BLR-33                     |
| LDC-BLR-34         | 836             | Former 'What' Store, Cross Keys, Lichfield  | 0.3       | Permitted (Full planning permission)                               | 35                           | BLR-34                     |
| LDC-BLR-35         | 840 & 1056      | Fradley Strategic Development Allocation (SDA), Halifax Avenue, Fradley                   | 34.0      | Permitted (Part outline & part full planning permission)           | 750                          | BLR-35                     |
| LDC-BLR-36         | 926             | Boney Hay Concrete, Chorley Road, Burntwood   | 0.34      | Permitted (Full planning permission)                               | 7                            | BLR-36                     |
| LDC-BLR-37         | 974             | The New Lodge, Kings Bromley Road, Alrewas  | 0.15      | Permitted (Full planning permission)                               | 6                            | BLR-37                     |
| LDC-BLR-38         | 1005            | Tricorn House, 99-101 High Street, Chasetown, Burntwood                                   | 0.15      | Permitted (Full planning permission)                               | 7                            | BLR-38                     |
| LDC-BLR-39         | 1022            | Station Works, Colton Road, Rugeley   | 0.4       | Permitted (Outline planning permission)                            | 14                           | BLR-39                     |
| LDC-BLR-40         | 1031            | Rugeley Power Station   | 83.8      | Not permitted  | 820-880                      | BLR-40                     |
| LDC-BLR-41         | 1040            | Lombard Court, Lombard Street, Lichfield  | 0.13      | Permitted (Full planning permission)                               | 14                           | BLR-41                     |
| LDC-BLR-42         | 1070            | Beatrice Court, St John Street, Lichfield   | 0.36      | Permitted (Full planning permission)                               | 39                           | BLR-42                     |
| LDC-BLR-43         | 1102            | Land at Greenhough Road, Lichfield  | 0.5       | Permitted (Full planning permission)                               | 39                           | BLR-43                     |
| LDC-BLR-44         | 1109            | Levett Road, Lichfield  | 0.7       | Permitted (Full planning permission)                               | 22                           | BLR-44                     |
| LDC-BLR-45         | 1122            | Land off Milestone Way, Burntwood   | 4.4       | Permitted (Outline planning permission subject to signing of s106) | 150                          | BLR-45                     |

## 4.0 Appendix A: Schedule of rejected sites (stage 2)

**Table A.1**

| SHLAA reference | Site Name   | Reason rejected  |
|-----------------|---|--|
| 6               | Nearfield House, Eastern Avenue, Lichfield          | The site is outside of the settlement within the Green Belt. Planning permission granted for alternative use (redevelopment of site for 70 bed care home). Planning permission has been implemented with development under construction.         |
| 241             | Shenstone Garden Centre, Birmingham Road, Shenstone | The site is located within the Green Belt and is not within a defined village settlement boundary (including village settlement boundaries proposed through the emerging LPA).   |
| 500             | Shenstone Employment Area                           | The site is within allocated employment area. Employment area is proposed to be retained through the emerging Local Plan Allocations document. Therefore current and emerging planning policy would restrict land use to employment development. |
| 765             | Colton Mill Industrial Estate, Colton Road          | The site is located within the open countryside and is not within a defined village settlement boundary (including village settlement boundaries proposed through the emerging LPA).   |
| 838             | Fradley West, Gorse Lane, Fradley                   | The site is located within the open countryside and is not within a defined village settlement boundary (including village settlement boundaries proposed through the emerging LPA).   |

## 5.0 Appendix B: Schedule of rejected sites (stage 3)

**Table B.1**

| SHLAA reference | Site Name   | Reason rejected   |
|-----------------|---|---|
| 12              | The Abattoir, Eastgate Street, Chase Terrace, Burntwood | Urban Capacity Assessment assesses the site as not being 'available'.   |
| 59              | 29 Sandford Street, Lichfield                           | Urban Capacity Assessment assesses the site as not being 'available'.   |
| 62              | Queen Street Depot, Queen Street, Lichfield             | Urban Capacity Assessment assesses the site as not being 'available'. Site is currently used as part of operational mechanics and garage.   |
| 96              | Fazeley Saw Mill, Lichfield Street, Lichfield           | Urban Capacity Assessment assesses the site as not being 'available'.   |
| 98              | 51-55 High Street, Chasetown, Burntwood                 | Urban Capacity Assessment assesses the site as not being 'available'.   |
| 112             | Lichfield Social Club, Purcell Avenue, Lichfield        | Urban Capacity Assessment assesses the site as not being 'available'. Site is currently operational community facility (Working Men's Club).  |
| 113             | Duke of York Public House, Church Street, Lichfield     | Urban Capacity Assessment assesses the site as not being 'available'. Site is currently operational community facility (Public House).  |
| 116             | Petrol Station, Lichfield Street, Fazeley               | Urban Capacity Assessment assesses the site as not being 'available'. Site is currently operational business.   |
| 119 (Part)      | Mount Road Industrial Estate, Mount Road, Burntwood     | Urban Capacity Assessment assesses part of the site as not being 'available'. Majority of site is currently operational industrial estate. <i>(NB-part of site has resolution to grant planning permission for 96 dwellings and is proposed to be allocated within the LPA document and is include on Part 1 of the BLR).</i>                         |
| 120             | Land at Armitage Shanks, Old Road, Armitage             | Urban Capacity Assessment assess site as 'uncertain' due to concerns over sites availability. The UCA notes that the site could potentially deliver within the plan period. Site is considered to be suitable but concerns over availability lead to sites rejection at this stage. Opportunities to explore availability of site should be explored. |
| 129             | Land rear 19 Rugeley Road, Chasetown, Burntwood         | Urban Capacity Assessment assesses the site as not being 'available'.   |

| SHLAA reference | Site Name   | Reason rejected   |
|-----------------|---|---|
| 147             | Swan Island Garage, Swan Island, Burntwood            | Urban Capacity Assessment assesses the site as not being 'available'. Site is currently operational garage.   |
| 149             | Redcourt House, Greenhill, Lichfield District Council | Urban Capacity Assessment assesses the site as not being 'available'. Site is currently used for retail units.  |
| 150             | Redcourt Car Park, Green Hill, Lichfield              | Urban Capacity Assessment assesses the site as not being 'uncertain' in terms of availability and deliverability. Site is currently a council owned/run multi-storey car park within the town centre. Current evidence suggests site is not available for development.  |
| 151             | Spinney Lane Squash Club, Spinney Lane, Burntwood     | Urban Capacity Assessment assesses the site as not being 'available'.   |
| 403             | Former HSBC Hire, Burton Road Streethay               | Urban Capacity Assessment assesses the site as not being 'available'. Site is currently used for operational business.  |
| 406             | Borrow Pit, Rugeley Power Station                     | Site is allocated as part of Strategic Development Allocation within adopted LPS. Emerging LPA document and Rugeley Power Station SPD seek to retain site as open space.  |
| 413             | Central Garage, Queen Street, Lichfield               | Urban Capacity Assessment assesses the site as not being 'available'. Site is currently used as operational mechanics and garage.   |
| 423             | Royal Oak Public House, Main Street, Stonnall         | Urban Capacity Assessment assesses the site as not being 'available'.   |
| 424             | Guardian House, Birmingham Road, Lichfield            | Urban Capacity Assessment assesses the site as not being 'available'. Site is currently in use office building.   |
| 462 (part)      | Land at Tesco Store, Church Street, Lichfield         | Urban Capacity Assessment assess site as 'uncertain' due to concerns over sites availability. The UCA notes that the site could potentially deliver within the plan period. Site is considered to be suitable but concerns over availability lead to sites rejection at this stage. Opportunities to explore availability of site should be explored. |
| 507             | Mount Road Industrial Estate (North), Prospect Road   | Urban Capacity Assessment assesses part of the site as not being 'available'. Site is currently operational industrial estate.  |

| SHLAA reference | Site Name   | Reason rejected   |
|-----------------|---|---|
| 739             | King Edward VI School, Upper St John Street, Lichfield    | Urban Capacity Assessment assesses the site as not being 'available'. Site required for continued use for education provision.  |
| 755             | Bloomfield Crescent Garage Court, Lichfield               | Urban Capacity Assessment assesses the site as not being 'available'.   |
| 756             | Bloomfield Crescent Garage Court (2), Lichfield           | Urban Capacity Assessment assesses the site as not being 'available'.   |
| 764             | Tolsons Industrial Estate, Mill Lane, Fazeley             | Urban Capacity Assessment assesses part of the site as not being 'available'. Site is currently operational industrial estate.  |
| 766             | Swan Road Car Park, Swan Road, Lichfield District Council | Urban Capacity Assessment assesses part of the site as not being 'available' and not deliverable for residential development due to adjacent uses.  |
| 767             | Sandford Street Car Park, Sandford Street, Lichfield      | Urban Capacity Assessment assesses the site as being 'uncertain' in terms of availability and deliverability. Site is currently a council owned/run car park within the town centre. Current evidence suggests site is not available for residential development at this time.  |
| 776             | Former Rocklands School, Wissage Road, Lichfield          | Urban Capacity Assessment assesses the site as not being 'available'. Site required for continued use for education provision.  |
| 821             | Land rear 161-167 High Street, Chasetown, Burntwood       | Urban Capacity Assessment assesses the site as not being 'available'.   |
| 835             | Former GKN Sinter, Trent Valley Road, Lichfield           | Site is within existing employment area, however emerging LPA proposes the removal of the site from the employment area. Urban Capacity Assessment assess site as 'uncertain' due to concerns over sites availability. The UCA notes that the site could potentially deliver a mixture of development within the plan period. Site is considered to be suitable but concerns over availability lead to sites rejection at this stage. Opportunities to explore availability of site should be explored. |
| 841             | Former Olaf Johnson site, Cannock Road, Burntwood         | Site is within town centre boundary. Planning permission granted for retail development. Not considered to be available for residential development.  |




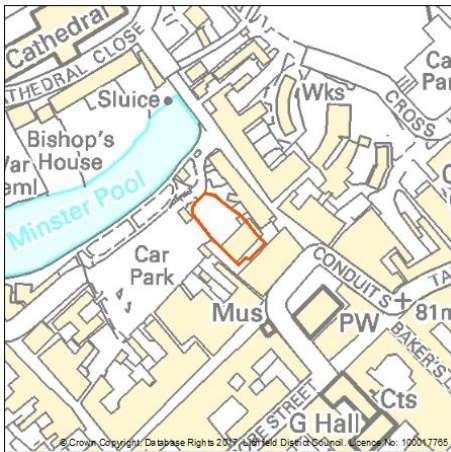
## 6.0 Appendix C: BLR site maps

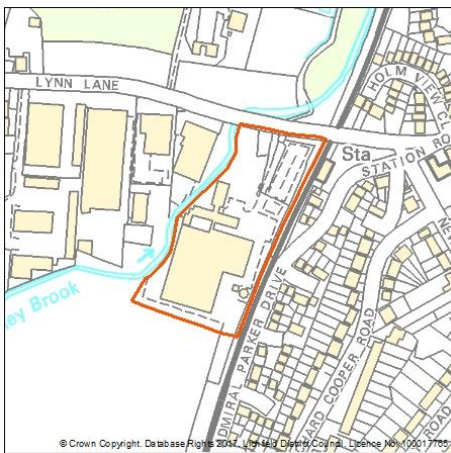
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| <p><b>Site Reference:</b> LDC-BLR-1</p>                                  |  |
| <p><b>Map reference:</b> BLR-01</p>                                      |  |
| <p>Site Name: Lichfield Highways Depot, Trent Valley Road, Lichfield</p> |  |
| <p>SHLAA ID: 1</p>   |  |

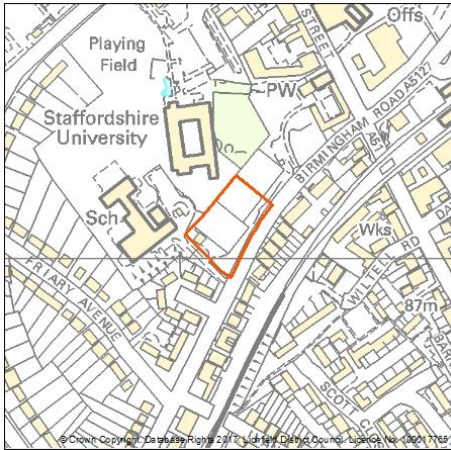
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| <p><b>Site Reference:</b> LDC-BLR-2</p>   |  |
| <p><b>Map reference:</b> BLR-02</p>   |  |
| <p>Site Name: Land rear Chase Terrace Primary School, Rugeley Road, Burntwood</p> |  |
| <p>SHLAA ID: 4</p>  |  |

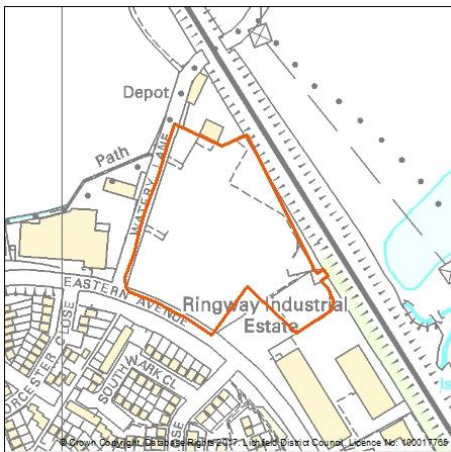
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| <p><b>Site Reference:</b> LDC-BLR-3</p>                |  |
| <p><b>Map reference:</b> BLR-03</p>                    |  |
| <p>Site Name: Maple Close/Sycamore Road, Burntwood</p> |  |
| <p>SHLAA ID: 7</p>                                     |  |

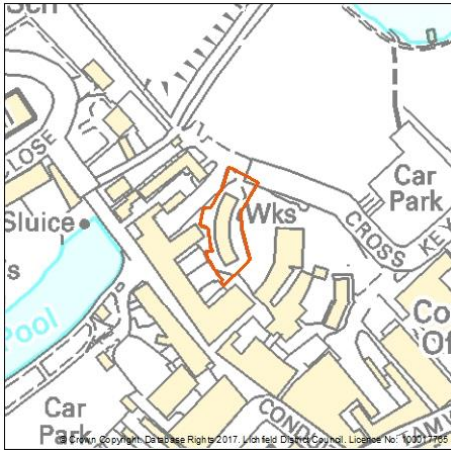
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|---|--|
| <b>Site Reference: LDC-<br/>BLR-4</b>                       |  <p>A street map showing the Whittington Youth Centre site highlighted in orange. The site is located on Main Street, between Chapel Lane and Tel. Ex. A 67m distance marker is shown. Other streets include Way, Path, Chapel Lane, PO, Main Street, Tel. Ex., and Lechwood Lane.</p> |
| <b>Map reference: BLR-04</b>                                |  |
| Site Name: Whittington Youth Centre, Main Road, Whittington |  |
| SHLAA ID: 8   |  |

|   |  |
|---|--|
| <b>Site Reference: LDC-<br/>BLR-5</b>           |  <p>A street map showing the Minster Hall Youth Centre site highlighted in orange. The site is located on Conduit Street, near the Minster Pool and Bishop's House. Other streets include Cathedral Close, Sluice, Wks, Cross, Conduit St, Baker's St, and G Hall. A distance marker of 81m is shown.</p> |
| <b>Map reference: BLR-05</b>                    |  |
| Site Name: Minster Hall Youth Centre, Lichfield |  |
| SHLAA ID: 9                                     |  |

|   |  |
|---|--|
| <b>Site Reference: LDC-<br/>BLR-6</b>   |  <p>A street map showing the Shenstone Business Park and Birchbrook Industrial Estate site highlighted in orange. The site is located on Lynn Lane, near the Sta. Station Road and the By Brook. Other streets include Lynn Lane, Admiral Parker Drive, and Birchbrook Road.</p> |
| <b>Map reference: BLR-06</b>  |  |
| Site Name: Shenstone Business Park and Birchbrook Industrial Estate, Lynn Lane, Shenstone |  |
| SHLAA ID: 30  |  |

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| <p><b>Site Reference: LDC-BLR-7</b></p>                                    |  |
| <p><b>Map reference: BLR-07</b></p>  |  |
| <p>Site Name: Former Lichfield Tennis Club, Birmingham Road, Lichfield</p> |  |
| <p>SHLAA ID: 31</p>  |  |

|  |   |
|--|---|
| <p><b>Site Reference: LDC-BLR-8</b></p>                              |  |
| <p><b>Map reference: BLR-08</b></p>                                  |   |
| <p>Site Name: Former Integra/Hepworth, Eastern Avenue, Lichfield</p> |   |
| <p>SHLAA ID: 39</p>  |   |

|   |  |
|---|--|
| <p><b>Site Reference: LDC-BLR-9</b></p>                 |  |
| <p><b>Map reference: BLR-09</b></p>                     |  |
| <p>Site Name: St Chads House, Cross Keys, Lichfield</p> |  |
| <p>SHLAA ID: 44</p>                                     |  |

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|---|--|
| <p><b>Site Reference: LDC-BLR-10</b></p>                        |  |
| <p><b>Map reference: BLR-10</b></p>                             |  |
| <p>Site Name: Former Park Road Printers, Park Road, Alrewas</p> |  |
| <p>SHLAA ID: 46</p>   |  |

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|--|--|
| <p><b>Site Reference: LDC-BLR-11</b></p>         |  |
| <p><b>Map reference: BLR-11</b></p>              |  |
| <p>Site Name: Packington Hall, Tamworth Road</p> |  |
| <p>SHLAA ID: 51</p>                              |  |

|   |  |
|---|--|
| <p><b>Site Reference: LDC-BLR-12</b></p>                              |  |
| <p><b>Map reference: BLR-12</b></p>                                   |  |
| <p>Site Name: Auction centre and land at Quonians Lane, Lichfield</p> |  |
| <p>SHLAA ID: 52</p>   |  |

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|  |  |
|--|--|
| <b>Site Reference: LDC-BLR-13</b>                          |  |
| <b>Map reference: BLR-13</b>                               |  |
| Site Name: Former Regal Cinema, Tamworth Street, Lichfield |  |
| SHLAA ID: 54   |  |

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|--|--|
| <b>Site Reference: LDC-BLR-14</b>                      |  |
| <b>Map reference: BLR-14</b>                           |  |
| Site Name: Angel Croft Hotel, Beacon Street, Lichfield |  |
| SHLAA ID: 60   |  |

|   |  |
|---|--|
| <b>Site Reference: LDC-BLR-15</b>               |  |
| <b>Map reference: BLR-15</b>                    |  |
| Site Name: The Windmill, Grange Lane, Lichfield |  |
| SHLAA ID: 61                                    |  |

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|--|--|
| <p><b>Site Reference: LDC-BLR-16</b></p>                                   |  |
| <p><b>Map reference: BLR-16</b></p>  |  |
| <p>Site Name: Land rear The Greyhound, Upper St John Street, Lichfield</p> |  |
| <p>SHLAA ID: 63</p>  |  |

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|--|--|
| <p><b>Site Reference: LDC-BLR-17</b></p>                       |  |
| <p><b>Map reference: BLR-17</b></p>                            |  |
| <p>Site Name: Former Nursery, 41 Cherry Orchard, Lichfield</p> |  |
| <p>SHLAA ID: 64</p>  |  |

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|--|--|
| <p><b>Site Reference: LDC-BLR-18</b></p>                                     |  |
| <p><b>Map reference: BLR-18</b></p>  |  |
| <p>Site Name: Mount Road Industrial Estate (part), Mount Road, Burntwood</p> |  |
| <p>SHLAA ID: 119 (part)</p>  |  |

|   |  |
|---|--|
| <p><b>Site Reference: LDC-BLR-19</b></p>                |  |
| <p><b>Map reference: BLR-19</b></p>                     |  |
| <p>Site Name: 114 High Street, Chasetown, Burntwood</p> |  |
| <p>SHLAA ID: 146</p>                                    |  |

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|--|--|
| <p><b>Site Reference: LDC-BLR-20</b></p>                   |  |
| <p><b>Map reference: BLR-20</b></p>                        |  |
| <p>Site Name: The Greyhound, Boney Hay Road, Burntwood</p> |  |
| <p>SHLAA ID: 152</p>                                       |  |

|   |  |
|---|--|
| <p><b>Site Reference: LDC-BLR-21</b></p>                                  |  |
| <p><b>Map reference: BLR-21</b></p>                                       |  |
| <p>Site Name: Former Acorn Garage, Queen Street, Chasetown, Burntwood</p> |  |
| <p>SHLAA ID: 156</p>  |  |

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|---|--|
| <p><b>Site Reference: LDC-BLR-23</b></p>                    |  |
| <p><b>Map reference: BLR-22</b></p>                         |  |
| <p>Site Name: Rugeley Canal Side, Rugeley Road, Rugeley</p> |  |
| <p>SHLAA ID: 157</p>  |  |

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|--|--|
| <p><b>Site Reference: LDC-BLR-23</b></p>                     |  |
| <p><b>Map reference: BLR-23</b></p>                          |  |
| <p>Site Name: Land adjacent 84 Cherry Orchard, Lichfield</p> |  |
| <p>SHLAA ID: 164</p>   |  |

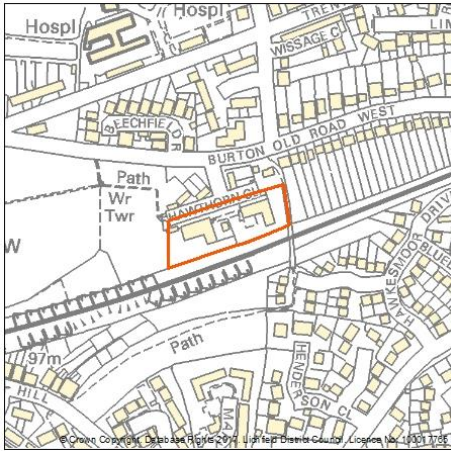
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| <p><b>Site Reference: LDC-BLR-24</b></p>                |  |
| <p><b>Map reference: BLR-24</b></p>                     |  |
| <p>Site Name: 1-3 High Street, Chasetown, Burntwood</p> |  |
| <p>SHLAA ID: 167</p>                                    |  |

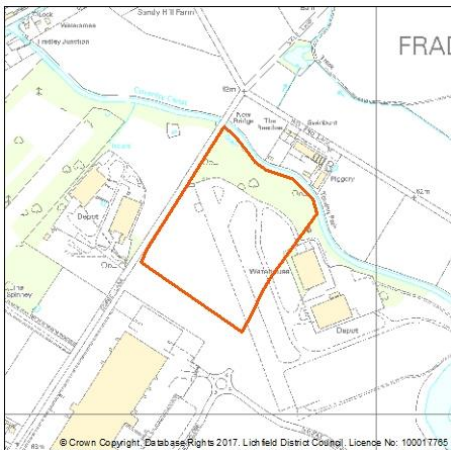



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|--|--|
| <p><b>Site Reference: LDC-BLR-25</b></p>                         |  |
| <p><b>Map reference: BLR-25</b></p>                              |  |
| <p>Site Name: Former Royal Oak, Uttoxeter Road, Hill Ridware</p> |  |
| <p>SHLAA ID: 255</p>   |  |

|   |  |
|---|--|
| <p><b>Site Reference: LDC-BLR-26</b></p>                                  |  |
| <p><b>Map reference: BLR-26</b></p>                                       |  |
| <p>Site Name: Trent Valley Buffer Depot, Trent Valley Road, Lichfield</p> |  |
| <p>SHLAA ID: 415</p>  |  |

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| <p><b>Site Reference: LDC-BLR-27</b></p>                         |  |
| <p><b>Map reference: BLR-27</b></p>                              |  |
| <p>Site Name: Beaconsfield House, Sandford Street, Lichfield</p> |  |
| <p>SHLAA ID: 418</p>   |  |

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| <p><b>Site Reference: LDC-BLR-28</b></p>                     |  <p>A detailed street map showing the Hawthorn House site highlighted in orange. The site is located on Burton Old Road West, between a 'Path Wr Twr' and a 'Path'. Surrounding streets include 'WISSAGE C', 'HOSPITAL', 'HILL', and 'WALKING'. A '97m' contour line is also visible.</p> |
| <p><b>Map reference: BLR-28</b></p>                          |   |
| <p>Site Name: Hawthorn House, Burton Old Road, Lichfield</p> |   |
| <p>SHLAA ID: 425</p>   |   |

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|---|---|
| <p><b>Site Reference: LDC-BLR-29</b></p>  |  <p>A map showing the Fradley Strategic Development Allocation (SDA) site highlighted in orange. The site is located off Gorse Lane, near Fradley Park. The map includes labels for 'Sandy Hill Farm', 'Fradley', and 'Waterside'. A '97m' contour line is also visible.</p> |
| <p><b>Map reference: BLR-29</b></p>   |   |
| <p>Site Name: Fradley Strategic Development Allocation (SDA), land off Gorse Lane, Fradley Park</p> |   |
| <p>SHLAA ID: 426</p>  |   |

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|--|--|
| <p><b>Site Reference: LDC-BLR-30</b></p>   |  <p>A detailed street map showing the site near The Greyhound highlighted in orange. The site is located near a 'School' and a 'Factory'. Surrounding streets include 'SCOTCH ORCHARD', 'MANLEY ROAD', 'WKS', and 'RECN GD'. A '97m' contour line is also visible.</p> |
| <p><b>Map reference: BLR-30</b></p>  |  |
| <p>Site Name: Land rear The Greyhound, Former Children's Home, Scotch Orchard, Lichfield</p> |  |
| <p>SHLAA ID: 428</p>   |  |

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| <p><b>Site Reference: LDC-BLR-31</b></p>                                 |  |
| <p><b>Map reference: BLR-31</b></p>                                      |  |
| <p>Site Name: Cottage of Content, Queen Street, Chasetown, Burntwood</p> |  |
| <p>SHLAA ID: 429</p>   |  |

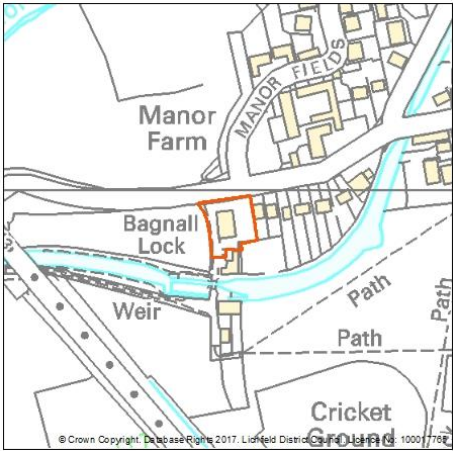
|  |  |
|--|--|
| <p><b>Site Reference: LDC-BLR-32</b></p>                                   |  |
| <p><b>Map reference: BLR-32</b></p>  |  |
| <p>Site Name: Former Bridge Cross Garage, Bridge Cross Road, Burntwood</p> |  |
| <p>SHLAA ID: 478</p>   |  |

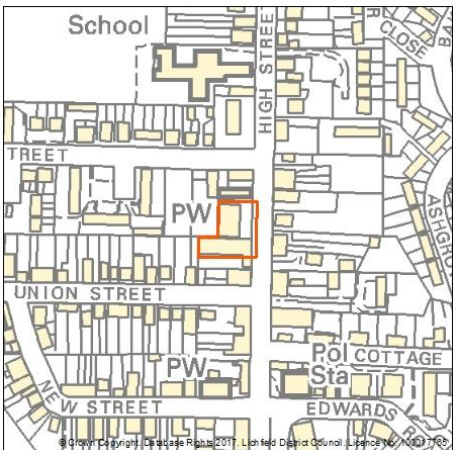
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|---|--|
| <p><b>Site Reference: LDC-BLR-33</b></p>  |  |
| <p><b>Map reference: BLR-33</b></p>   |  |
| <p>Site Name: East of Burntwood Bypass Strategic Development Allocation (SDA), Milestone Way, Burntwood</p> |  |
| <p>SHLAA ID: 497</p>  |  |

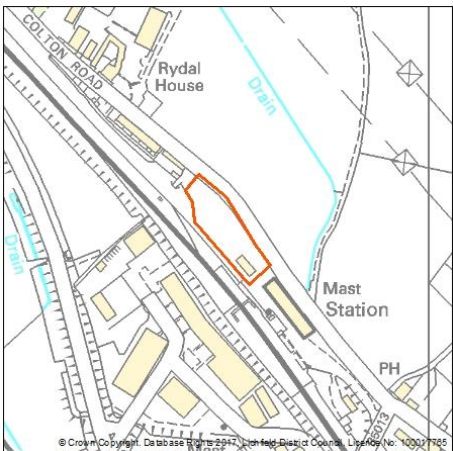
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| <p><b>Site Reference: LDC-BLR-34</b></p>                     |  |
| <p><b>Map reference: BLR-34</b></p>                          |  |
| <p>Site Name: Former 'What' Store, Cross Keys, Lichfield</p> |  |
| <p>SHLAA ID: 836</p>   |  |

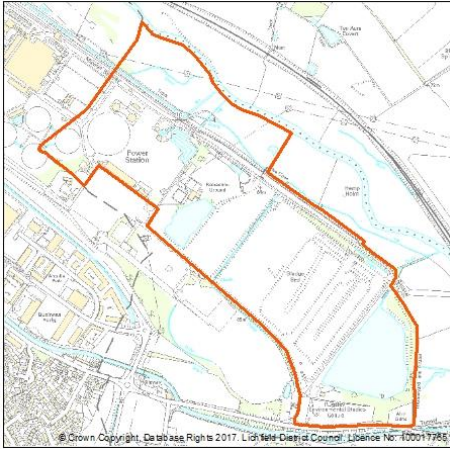
|   |  |
|---|--|
| <p><b>Site Reference: LDC-BLR-35</b></p>  |  |
| <p><b>Map reference: BLR-35</b></p>   |  |
| <p>Site Name: Fradley Strategic Development Allocation (SDA), Halifax Avenue, Fradley</p> |  |
| <p>SHLAA ID: 840 &amp; 1056</p>   |  |

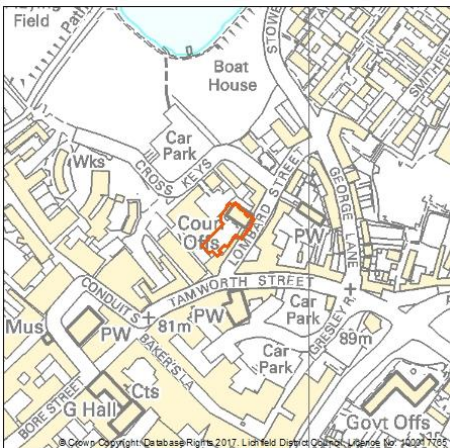
|   |  |
|---|--|
| <p><b>Site Reference: LDC-BLR-36</b></p>                      |  |
| <p><b>Map reference: BLR-36</b></p>                           |  |
| <p>Site Name: Boney Hay Concrete, Chorley Road, Burntwood</p> |  |
| <p>SHLAA ID: 926</p>  |  |

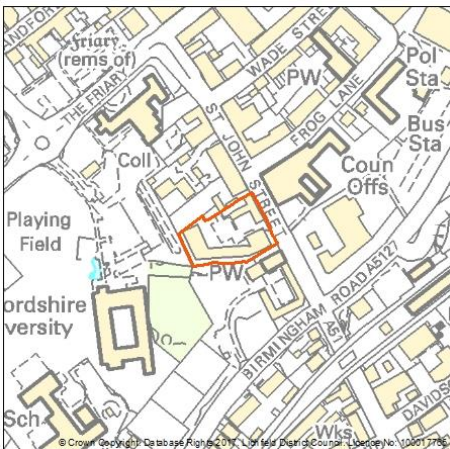
|   |  |
|---|--|
| <b>Site Reference: LDC-BLR-37</b>                     |  |
| <b>Map reference: BLR-37</b>                          |  |
| Site Name: The New Lodge, Kings Bromley Road, Alrewas |  |
| SHLAA ID: 974   |  |

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|--|---|
| <b>Site Reference: LDC-BLR-38</b>                                  |  |
| <b>Map reference: BLR-38</b>                                       |   |
| Site Name: Tricorn House, 99-101 High Street, Chasetown, Burntwood |   |
| SHLAA ID: 1005   |   |

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|--|--|
| <b>Site Reference: LDC-BLR-39</b>              |  |
| <b>Map reference: BLR-39</b>                   |  |
| Site Name: Station Works, Colton Road, Rugeley |  |
| SHLAA ID: 1022                                 |  |

|                                   |  |
|-----------------------------------|--|
| <b>Site Reference: LDC-BLR-40</b> |  |
| <b>Map reference: BLR-40</b>      |  |
| Site Name: Rugeley Power Station  |  |
| SHLAA ID: 1031                    |  |

|   |   |
|---|---|
| <b>Site Reference: LDC-BLR-41</b>                   |  |
| <b>Map reference: BLR-41</b>                        |   |
| Site Name: Lombard Court, Lombard Street, Lichfield |   |
| SHLAA ID: 1040                                      |   |

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|--|--|
| <b>Site Reference: LDC-BLR-42</b>                    |  |
| <b>Map reference: BLR-42</b>                         |  |
| Site Name: Beatrice Court, St John Street, Lichfield |  |
| SHLAA ID: 1070                                       |  |

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| <p><b>Site Reference: LDC-BLR-43</b></p>             |  |
| <p><b>Map reference: BLR-43</b></p>                  |  |
| <p>Site Name: Land at Greenhough Road, Lichfield</p> |  |
| <p>SHLAA ID: 1102</p>                                |  |

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|--|--|
| <p><b>Site Reference: LDC-BLR-44</b></p> |  |
| <p><b>Map reference: BLR-44</b></p>      |  |
| <p>Site Name: Levett Road, Lichfield</p> |  |
| <p>SHLAA ID: 1109</p>                    |  |

|   |  |
|---|--|
| <p><b>Site Reference: LDC-BLR-45</b></p>            |  |
| <p><b>Map reference: BLR-45</b></p>                 |  |
| <p>Site Name: Land off Milestone Way, Burntwood</p> |  |
| <p>SHLAA ID: 1122</p>                               |  |





# DELIVERING OUR LOCAL PLAN

Cllr Ian Pritchard

Date: 19<sup>th</sup> September 2017

Agenda Item: 6

Contact Officer: Craig Jordan

Tel Number: 01543 308202

Email: craig.jordan@lichfielddc.gov.uk

Key Decision? **YES NO (delete as appropriate)**

**Local Ward Members** If any Wards are particularly affected insert the name of the Ward Members and their Ward. Ensure that the Ward Members have been consulted.



**ECONOMIC  
GROWTH,  
ENVIRONMENT AND  
DEVELOPMENT  
(OVERVIEW AND  
SCRUTINY)  
COMMITTEE**

## 1. Executive Summary

- 1.1 The approved and adopted Local Plan for Lichfield District sets out spatial policy and plans for the future development and growth of the area. It is a vital document in providing for the needs of existing and future residents and for supporting business and the local economy. A key requirement for the Council is to monitor implementation of the Local Plan and in particular identify issues impacting upon delivery of its policies. This is not only good practice but also essential to determine whether policies are appropriate and delivering what they are intended to deliver.
- 1.2 As members will know the District has an approved Local Plan Strategy setting out an overall planning strategy and major strategic development allocations (SDA's). Work is currently taking place to bring forward a Part 2 Land Allocations document providing for more detailed topic and site specific policy and additional allocations to ensure that sufficient housing and employment comes forward to meet needs.
- 1.3 This report provides an update on progress with implementation of principally the main housing and employment sites in the District originating from the Local Plan Strategy. The report highlights the use of a monitoring tool that has been developed by the Council to check on the delivery of key sites. Such a tool has the benefits of allowing an assessment to be carried out of plan progress but also a warning light for non-delivery and where the Council may want to explore why a development is stalled and what actions could potentially be undertaken to unblock any barriers to development.

## 2. Recommendations

- 2.1 That the Committee notes progress on the delivery of key sites within the Local Plan Strategy
- 2.2 That the Committee notes the use of a monitoring tool to help the Council oversee delivery of the Local Plan key sites
- 2.3 That the Committee notes the planned interventions by the Council and/or its partners to assist in the delivery of sites where these are currently blocked or progress is slower than predicted.

### 3. Background

- 3.1 The Local Plan Strategy was formally approved and adopted by the District Council in February 2015 having been the subject of a public examination and report of an independent Inspector. The Plan runs from 2008-2029 and sets out an overall spatial strategy for the District intended to meet housing and employment needs in the area and the provision of supporting local and strategic infrastructure.
- 3.2 The Plan identifies a housing requirement of a minimum of 10,030 dwellings (equivalent to 478 per annum). This requirement is to be delivered mainly via a number of strategic development allocations, broad development locations and smaller site allocations in the Districts two main urban centres Lichfield and Burntwood and at Alrewas, Shenstone, Fradley, Whittington, Armitage with Handsacre and Fazeley. In part some of the development will be to meet the needs of neighbouring Tamworth and Cannock Chase. Outside of these settlements and in the rural areas, only housing to meet local needs is to be permitted.

#### Strategic Development Allocations (SDA's)

| Location                                | Number of Homes   |
|---|---|
| South of Lichfield                      | 450   |
| South Lichfield – Deans Slade Farm      | 450   |
| South Lichfield – Cricket Lane          | 450   |
| East of Lichfield (Streethay)           | 750   |
| Fradley                                 | 1,250   |
| East of the Burntwood Bypass, Burntwood | 375   |
| East of Rugeley                         | 1,125 (inc. 500 to meet the needs arising within Rugeley) |

#### Broad Development Location (BDL)

| Location          | Number of Homes  |
|-------------------|--|
| North of Tamworth | 1,000 (inc. 500 to meet the needs arising within Tamworth) |

- 3.3 In terms of employment the Local Plan seeks to provide for 7,310 and 9,000 additional jobs and linked to this allocates approximately 90 ha of land to support job creation. Alongside existing employment areas such as Fradley Business Park, Britannia Park, Eastern Avenue, Lichfield and Chasetown Industrial Estate & Burntwood Business Park, Burntwood, land to serve new employment and enterprise is identified south of Lichfield, near Streethay and at Fradley.

3.4 Investment and growth in our centres providing for new employment opportunities also forms part of the Plan with Lichfield being identified as a strategic centre serving a wide hinterland, Burntwood representing a key centre complemented by local centres at Alrewas, Armitage with Handsacre, Fazeley, Fradley, Little Aston, Shenstone & Whittington. A number of existing neighbourhood centres are acknowledged within Lichfield and Burntwood and the Local Plan proposes new neighbourhood centres at South Lichfield, Streethay and East of Rugeley.

#### Delivery of the Local Plan

3.5 The headline figures and policies noted above highlight the importance of having in place a Local Plan for the District. The process of plan making itself clearly shows the levels of housing that the District needs to plan for to meet its needs as does the number of jobs to ensure that there is a suitable balance between people and employment opportunities. Safeguarding and where possible growing our centres is also crucial allowing residents to access essential services and shopping facilities as well as enjoy leisure and recreational provision. Overall, the aim is to deliver the growth vital to sustaining local communities and putting in place the building blocks to facilitate sustainable levels of economic growth.

3.6 Development is important however not just to meet the needs of residents or business but also increasingly to support local services including those provided by the District Council and County Council. Successive Governments have sought to link growth of housing and employment to increased income in and investment into areas. As part of a national policy on encouraging the growth particularly of housing, incentives have been offered to local authorities. For a period of time now Local authorities within England have been rewarded for all new housing taking place in their areas with New Homes Bonus (NHB). The income received is to be used to support the services that increased populations will demand. Furthermore, as part of the review of local government financing it is being proposed that in due course all business rates collected in an area will remain within that area. The link here is obvious, the more new businesses that can be attracted to an area the more business rates that will be generated. At a time when public expenditure is being greatly reduced, these 'incentives' are significant.

3.7 For the reasons outlined in the preceding paragraphs the District Council needs to be aware of how well (or badly) Lichfield is performing having regards to the delivery of its Local Plan and in particular the implementation of those policies designed to provide for housing and employment. However, in addition to being aware the Council also needs to have mechanisms in place which can flag up potential problems and initiate a process whereby possible solutions can be found to unblock barriers to growth.

3.8 Over the past 12 months, the Council has put in place a detailed monitoring process allowing it to review delivery of the Local Plan with a particular focus on key development sites. Alongside the monitoring the Council has developed a means of assessing the relative status of sites and where delivery is seen as an issue, the scope for intervention by the Council and or/other partners and stakeholders. Attached at **Appendix 1** is a summary of delivery at August 2017, a narrative explaining the monitoring process being used and key issues which have been identified.

#### Alternative Options

1. There is a requirement to monitor delivery of the District's Local Plan, though

|  |  |
|--|--|
|  | monitoring can take many forms and depends on the nature of an individual Plan and its contents. In addition to the approach set out in this report dealing principally with housing and employment, the Council also prepares an Annual Monitoring Report which considers a broader range of Local Plan topics.   |
| Consultation                                       | 1. There has been no consultation on the contents of this report.  |
| Financial Implications                             | 1. The report sets out progress of key development sites identified in the Local Plan and/or with planning permission. New housing development generates New Homes Bonus and Community Infrastructure Levy receipts to the District Council and may also deliver S106 developer contributions. Employment sites will generate Business rates and possibly S106 developer contributions depending on the nature of development brought forward. The monitoring tool helps to align delivery of new development with projected receipts which itself assists in planning for new services and supporting infrastructure. |
| Contribution to the Delivery of the Strategic Plan | 1. The Local Plan is a key vehicle for delivering on a number of the Council's strategic ambitions including in particular providing for a vibrant and prosperous economy and creating green, clean and welcoming places for people to live.   |
| Equality, Diversity and Human Rights Implications  | 1. The monitoring tool can help identify the delivery of housing to meet specific needs eg. affordable, social housing and employment opportunities.   |
| Crime & Safety Issues                              | 1. None specifically from this report.   |

|   | Risk Description   | How We Manage It  | Severity of Risk (RYG) |
|---|--|---|------------------------|
| A | Local Plan policies and plans are not delivered or not delivered within the timescales envisaged | Careful monitoring of the delivery of policies and plans and intervention where felt necessary. | Amber                  |

Background documents Lichfield District Local Plan Strategy – adopted February 2015

Relevant web links <https://www.lichfielddc.gov.uk/Council/Planning/The-local-plan-and-planning-policy/Local-plan/Local-plan.aspx>

## Monitoring Report – August 2017

### Background

As part of its commitment to realising growth and to maximise the benefits that new development can bring to the District the District Council has been keen to monitor delivery of key housing, employment and commercial/retail sites.

A monitoring tool has duly been developed to determine the progress of sites allocated for development in the Local Plan using a traffic light colour-coded system to help in interpretation. The system works as follows:

**Green** – a site is either under construction or there are no known barriers to a start being made

**Amber** – there are some outstanding issues, perhaps planning, ownership, technical issues, preventing a start being made at the present time

**Red** – there are some uncertainties as to when (or even if) development will commence. This may be because the planning status of a site is not clear, there has been a change of ownership or a technical problem has arisen.

The monitoring tool is based on an excel document populated with information available via Council services including spatial policy, development management and finance. The information is updated currently on a quarterly basis and going forward it is intended that this will be available in real time linked to the various services IT systems. The information available includes details of individual development sites (housing and employment), their current planning status, anticipated timescales for delivery and expected revenue for the Council.

Appended at the end of this document are full details of housing and employment sites captured by the monitoring tool and also summary information for each.

Whilst the monitoring document provides details on each of the sites, outlined below is a list of the housing sites which received an amber or red RAG status in relation to delivery, the planning status, anticipated income and key issues which have prevented the site coming forward along with actions / proposed next steps to encourage delivery.

| Development Site                             | Status | RAG   | Income   | Issues   | Actions  |
|--|--------|-------|----------|--|--|
| Land off Shortbutts Lane, South of Lichfield | S106   | Amber | £625,200 | Delay in signing S106 as site is in multiple ownership - developer confident that this is resolved | Establish timescale with developer for signing of S106<br><br>Submission of RM Ph1 application anticipated Autumn 2017 |

|   |                       |       |                         |  |   |
|---|-----------------------|-------|-------------------------|--|---|
| Cricket Lane,<br>South of<br>Lichfield                | Pre-app               | Amber | £625,200                | Commencement on site subject to implementation of Primary School on Land off Shortbutts  | Establish timescales for delivery of Land off Shortbutts<br><br>Submission of hybrid application anticipated Autumn 2017              |
| Hay End Lane,<br>Fradley                              | Planning Permission   | Amber | £347,400                | Delay in progressing RM application due to ongoing price negotiations between landowner & developer - developer confident that this will be resolved soon.                     | Establish timescale for RM submission   |
| East of<br>Burntwood<br>Bypass,<br>Burntwood          | On-site               | Amber | £521,200                | Completion of later phases dependant on revocation of a Hazardous Substances Consent on an adjacent industrial site  | LDC to assist in ensuring all required consents are obtained  |
| Borrow Pit, East of Rugeley / Armitage with Handsacre | Local Plan allocation | Red   | £1,569,200 <sup>1</sup> | Unsure as to whether this site will come forward for residential development or be retained as part of a wider scheme in accordance with Draft Local Plan Allocations Document | Establish future position of the Borrow Pit as part of Local Plan Allocation process  |
| Arkall Farm,<br>North of<br>Tamworth                  | S106 – call in by SOS | Red   | £1,389,000              | Called in by SoS   | LDC to robustly defend resolution during public inquiry which is likely to be held in Autumn 2017 with a decision expected early 2018 |
| Hallam Park,<br>Walsall Road,<br>Lichfield            | S106                  | Amber | £255,600                | Delay on site caused by land title issues - developer confident these will be resolved soon.   | Establish timescales for delivery – required to commence by Nov 2018  |
| Former Regal Cinema,<br>Tamworth<br>Street,Lichfield  | S106                  | Amber | £52,400                 | Site recently acquired by new owners who are considering amending the scheme - no indication of timescales   | Positively engage with new owners to help facilitate appropriate changes and deliver a viable high quality scheme                     |
| Triangle site,<br>Milestone Way,                      | S106                  | Amber | £209,000                | Delay in signing S106 due to land ownership issues with LCP-   | Seek to establish timescales for signing S106   |

<sup>1</sup> Total income relates to the whole of the East of Rugeley SDA

|  |                     |       |          |   |   |
|--|---------------------|-------|----------|---|---|
| Burntwood                                  |                     |       |          | expected to be resolved shortly.<br>Completion of later phases dependant on the revocation of Hazardous Substances Consent on an adjacent industrial site.                                    | Ensure all required consents are obtained                 |
| Tolsons Mill, Fazeley                      | Pre-app             | Amber | £138,400 | Positive pre- app discussions on revised scheme to refurb the listed building. Apartment scheme would be non-CIL chargeable and viability issues to be considered as part of planning balance | Await submission of planning application                  |
| Mount Road Industrial Estate, Burntwood    | Planning Permission | Amber | £132,000 | Scheme to have regard to environmental constraints from adjacent industrial premises - consultation with Environmental Health is on-going   | Resolve any outstanding environmental constraints (noise) |
| Former Windmill PH, Grange Lane, Lichfield | S106                | Red   | £16,400  | Permission expired July 17 - development stalled due to land title issues (unknown ownership) in relation to access   | Explore the use of CPO to 'unblock' site for development  |

The same information for employment sites is set out below:

| Development Site                                   | Status                             | RAG   | Income     | Issue   | Action  |
|--|------------------------------------|-------|------------|---|---|
| Cricket Lane, South of Lichfield                   | Pre-app                            | Amber | £3,634,800 | Relationship between housing and employment elements of the scheme  | Pre-app discussions regarding juxtaposition of employment with housing land – anticipate submission of hybrid application Autumn 2017 |
| Wood End Lane, Fradley Park, Rugeley Power Station | Planning permission                | Amber | £647,206   | Planning subject to securing an off-site biodiversity off set   | Secure off-site biodiversity off set  |
| Titan Site, Halifax Avenue, Fradley Park           | Extant RM approval                 | Amber | £140,697   | Land owner actively seeking an user   | Explore opportunity to assist land owner  |
| B100 Hilliards Cross, Wood End Lane, Fradley Park  | Previously allocated in Local Plan | Red   | £292,662   | Land owner keen to develop site but uncertainty over need for part of the site to serve Hilliards Cross junction improvements and lack of | Contact to be made with Highways England to understand whether or not highway improvement plans                                       |

|                                     |                     |       |            |   |   |
|-------------------------------------|---------------------|-------|------------|---|---|
|                                     |                     |       |            | end user  | would impact the site   |
| Lichfield South, Wall Island        | Planning Permission | Amber | £751,425   | Land owner / developer seeking financial support to bring forward site infrastructure and Ph1.  | Discussions held with GBSLEP / Finance Birmingham and SSLEP / SCC |
| Liberty Park                        | S106                | Amber | £1,359,960 | Discussions with prospective tenant for Ph1, seeking a taller building which will require a new application.  | Complete S106 agreement   |
| Former Olaf Johnson site, Burntwood | S106                | Amber | £679,360   | Subject to Cabinet approval LDC, SCC and developer have agreed to pay adjoining landowner a fee to allow access over an easement to 'unblock' site for development. | Seek cabinet approval<br>Complete S106 agreement                  |

### Commentary

In October 2016 when monitoring commenced a number of key sites were either at the planning stage or for various reasons not coming forward post planning permission having been granted or close to being granted (eg. following a resolution to grant). At the time whilst there were national factors at play affecting most parts of the country there were also some specific issues impacting particularly on Lichfield District. Such issues included having some complex development sites, developer expectations and landowner ambitions.

**Complex sites** – in the approved Local Plan we identify some strategic development allocations (SDA's) which are large sites, some involving multiple ownerships and requiring major infrastructure investment to facilitate the planned housing, employment etc. In some cases this makes for complex planning issues, land assembly issues or matters pertaining to how the site(s) will be developed out and by whom.

**Developer expectations** – Lichfield District because of its geography and character is a popular place for people to want to live and work and play. It is an attractive location therefore for the development industry and prices for land and property reflect this. In Lichfield City and its immediate environs are some of the most expensive houses in Staffordshire and the West Midlands. Developers seeking to build in the District are seeking to maximise their returns and with a strong housing market over the past 10-15 years have seen large margins produced. Since 2008 and the start of the recession arguably developers have been slow to bring forward schemes either because they purchased land at the top of the market and therefore they require prices to rise or they simply wish to see a return which is similar to that achieved in more healthier days. At the same time, developers are looking to cut costs. With major housebuilders involved they can afford to sit on sites and wait for the market to improve before committing to building out permissions.



**Landowner ambitions** – like developers, landowners are looking to get the best price for their land/property. They can see the difference in values of land reflecting its location and suitability for housing, employment etc and again like developers will make decisions when to sell and at what price taking account of a many different factors. Talking to some agents, the Council is aware that there are some landowners who are unwilling to sell at what is seen as market values and this of course prevents those sites coming forward. Some landowners will wish for example a purchasing developer to take the costs of bringing a development forward whereas others will recognise and acknowledge that their land will only be developed if the costs of infrastructure are taken into account in the price being offered to the vendor. The individual circumstances of such landowners will differ and the laws of demand and supply suggest that sales will eventually take place but not always and this can be a barrier.

Notwithstanding the above, since the beginning of 2017 it is noticeable that sites previously stalled are starting to come forward and planning issues are being resolved. Where allocated sites have no planning permission nor applications as yet submitted, we are also seeing approaches to the Council's Development Services to commence pre-application discussions.

***Recent residential development starts, permissions granted and pre-application discussions commenced (SEAN TO CHECK & UPDATE)***

***Development commenced***

Roman Heights, Streethay – Phase 1, Miller Homes

Fradley Park, Fradley – Phase 1, Bellway Homes

***Planning permissions granted***

Brookfield, Fradley – Redrow Homes

Triangle site, Milestone Way, Burntwood – subject to S106

Arkall Farm, north of Tamworth – resolved to grant subject to S106. However see note below.

***Applications submitted***

Deanslade Farm, Lichfield – potential increase in site density, uplift of 50 dwellings on original 450 allocation

***Pre – application discussions***

Cricket Lane SDA, Lichfield

Gorse Lane, Fradley Park, Fradley – part of larger SDA site

Former Regal Cinema, Lichfield – new owners seeking to revise proposals subject to pp

Tolsons Mill, Fazeley

It will be noted that the Council has resolved to grant permission for a residential scheme on land north of Tamworth known as Arkall Farm. The land in question is identified for housing in the adopted Local Plan for approximately 1000 dwellings, 500 of which are intended to meet some of Tamworth's housing requirements. Following the resolution to grant and in response to requests made by Tamworth BC and other parties concerned about the proposals, the Secretary of State has

decided to call-in the application for his determination and a public inquiry will now take place likely in Autumn of this year.

### ***Employment and commercial/retail***

After a period of very little new employment floorspace and commercial activity in the District like the housing industry, there has been an upturn in both development and potential schemes being identified.

Major new employment development has taken place at Fradley Park with a Pro-Logis scheme being built for Screwfix. This operation is scheduled to open shortly and create up to 400 new jobs. A resolution to grant planning permission has also very recently been made by the Council for a second Pro-Logis development adjacent to the aforementioned site with the developer confirming that the unit has a specific end user as client. A separate development proposal of c20,000 square metres off Wood End Lane is the subject of a planning application likely to be determined by July. The Liberty Park site in Lichfield awaits the signing of a S106 to allow implementation of a planning consent.

Outside of those sites listed above, there are a range of employment sites at differing stages of the 'development' process across the District. These are identified on the appended monitoring schedule and include both sites with and without an extant planning permission. A large site with pp at Fradley Park (Titan, Halifax Avenue) is being actively marketed by the owner but little or no interest has been shown by the market. A prominent undeveloped site lies undeveloped near the Wood End Lane, Hilliards Cross intersection. In discussions with the landowner officers have been informed that whilst there is market interest, the issue here relates to the uncertainty over whether part of the site would be needed to facilitate a junction improvement at Hilliards Cross. Council officers have advised that the landowner make contact with Highways England to determine whether that is the case and to explore options which could allow the site to come forward.

Another important site is that with planning permission and intended to form phase 2 of the Wall Island business park. Whilst there are no insurmountable problems, it is recognised that the nature of the proposed re-development scheme coupled with the previous uses of the site mean development costs are relatively high. The landowner and prospective developer of the site, Lingfields is seeing whether LEP funding would assist in bringing the site forward.

### **Retail/Commercial**

One of the Council's major objectives is to further develop and sustain the key retail and commercial centres of the District, Lichfield City and Burntwood. Planning policy helps to delineate city and town centre boundaries within which suitable town/centre uses will be encouraged and safeguarded. Development sites are also identified.

The longstanding Friarsgate proposal when implemented will bolster Lichfield city centre and add to its attractiveness for residents and visitors alike. In Burntwood the task is to ensure that suitable retail and commercial infrastructure is in place to meet more local needs. To this end planning permission has recently been granted for a retail development on the Olaf Johnson site complementing existing surrounding retail uses. Discussions are also ongoing with the same landowner to provide additional retail and possible community facilities on the blue hoarding site to the south of Morrisons store.

***Insert tables presented to LT on 16/8 in following order: Nb PDF files...***

Housing Summary sheet

Housing detailed sheet

Employment Summary sheet

Employment detailed sheet

# Local Plan update

Cabinet Member: Councillor I. Pritchard

Date: 19<sup>th</sup> September 2017

Agenda Item: 7

Contact Officer: Craig Jordan/ Ashley Baldwin

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Key Decision? YES

Local Ward  
Members



**Economic Growth,  
Environment and  
Development (Overview  
and Scrutiny)  
Committee**

## 1. Executive Summary

- 1.1 Consultation on the Draft Local Plan Allocations document (Regulation 19 Consultation) took place between 20<sup>th</sup> March 2017 and 12<sup>th</sup> of May 2017. Approximately 5000 representations were received in response to the consultation. These representations have been analysed and the main issues raised are now presented for the Committee to consider. The implications for the next stages of the Plan as a result of consultation are set out.
- 1.2 A revised timetable for the Local Plan Allocations document is proposed to take account of the delay in processing responses, along with a timetable for the Local Plan Review.

## 2. Recommendations

- 2.1 That the Committee note the summary of responses received.
- 2.2 That as a result of the consultation the Committee note the commitment to review the potential supply of housing available to meet the 10, 030 (minimum) dwelling requirement.
- 2.3 That the Committee note the commitment to a 'Focused Changes' consultation as a result of any major modifications.
- 2.4 That the Committee recommend that Cabinet approve the timetable for the Local Plan Allocations and Local Plan Review via an updated Local Development Scheme.

## 3. Background

### *Local Plan Allocations*

- 3.1 The purpose of this report is to update Members on the progress in preparing the Lichfield District Local Plan Allocations document. The Allocations document is intended to include:
  - Proposed employment and housing allocations.
  - Policy on Lichfield City Centre including demarcating primary and secondary retail frontages.
  - Policy on Burntwood Town Centre.
  - Policy on accommodating the needs of Gypsy, Traveller and Travelling Show people.
  - A review of previously saved policies emanating from the previous Lichfield District Local Plan June 1998.

In addition to the above this report identifies a revised timetable for the Local Plan Allocations and sets out a proposed timetable for the Local Plan Review.

3.2 Members will recall that the Council consulted on the proposed scope and nature of the Local Plan Allocations document (Regulation 18) from August 2016 – October 2016.

3.3 In total 98 responses were received by the Council at this stage, there were not considered to be any showstoppers identified by the responses. Officers assessed each comment made as part of preparing the Local Plan Allocations. In summary the key issues raised during the consultation were:

- A number of comments indicated that it would be preferable to deal with the Birmingham housing numbers and review Lichfield District’s own housing numbers now. In addition the level of employment land requirements were also recommended to be updated.
- Suggested Core Policies 1 and 6 were challenged in particular. This was primarily associated with the perceived need to review the Local Plan Strategy (2015) to deal with Birmingham’s housing needs. However other responses indicated that strategic changes to Core Policy 1 could create investment uncertainty, particularly in the retail sector.
- In relation to settlement policies such as Whit 4 (Whittington) it was suggested these should be amended to take account of unmet housing needs arising from Birmingham.
- Policy NR3 was challenged in terms of its perceived conflict with the NPPF.
- Policy CP4 was cited as being an issue because of the lack of infrastructure that has come forward aligned to what was set out in the Infrastructure Delivery Plan associated to the Local Plan Strategy (2015).
- Saved Policy NA.1 relating to the AONB was put forward for retention by the Cannock Chase AONB.
- Policy SC1 was highlighted as being in conflict with National guidelines due to the withdrawal of the Code of Sustainable Homes.
- In relation to Burntwood Town Centre, a general point of allowing a level of flexibility of uses on specific land identified in the town centre was made.
- The Council’s housing trajectory identified within the Local Plan Strategy (2015) was challenged.
- A total of 76 representations proposed sites for development, however the bulk of these sites had already been received by the Council through the Strategic Housing Land Availability Assessment (SHLAA). Any new information was considered by officers.

3.4 The Regulation 18 consultation helped to inform the most recent consultation on the draft Local Plan Allocations which concluded on the 12<sup>th</sup> May 2017. This consultation (Regulation 19) saw a significant rise in responses, with over 50 times more representations received compared with the Regulation 18 consultation.

3.5 The key issues raised during the consultation along with officer analysis are outlined below:

Table 1: Key Issues and proposed responses to Regulation 19 consultation

| Key Issue  | Response  |
|--|---|
| Line of Lichfield and Hatherton canal contains an inaccuracy                 | Proposals map to be amended to accurately plot the Lichfield and Hatherton canal line   |
| Lack of information pertaining the status of Land at Watery Lane, Curborough | Land at Watery Lane, Curborough was not considered to be in line with spatial strategy by the Council. However the Secretary of State, while agreeing that the proposal is not in line with the adopted Local Plan Strategy, determined to approve the Call in due to wider material considerations. The Council have |

| Key Issue  | Response   |
|--|--|
|  | challenged this in the High Court and at the time of writing await formal judgement in writing.  |
| Development within Green Belt objected to due to policy protection associated with the sites.  | The proposed Green Belt allocations were identified due to the need to identify land outside of settlement boundaries in order to meet the numbers associated with the Local Plan Strategy. A further analysis of the housing supply will be undertaken, taking into account any potential windfalls to re-assess the need for Green Belt release. This may result in the need for Focused changes to the draft Plan being consulted on.   |
| Need to look at brownfield sites first before releasing any Green Belt for development   | The Local Plan Allocations is supported by its evidence base, including the SHLAA which outlines sites, including brownfield sites that are available and deliverable within the plan period. Further, the Council is in the process of preparing its Brownfield Register which identifies brownfield land that is suitable for residential development.   |
| Site boundaries require amendment, for example the boundary associated with land at Dark Lane, Alrewas was cited as an allocation which required review. | Site boundaries have been reviewed and where appropriate such as at Dark Lane, Alrewas will be amended.  |
| Policy BE2 (Heritage Assets) is in conflict with National Policy   | Officers will work with stakeholders to agree appropriate changes seeking compliance with the NPPF   |
| Policy IP2 (Lichfield Canal), drafting of line is incorrect wording of policy requires minor alteration  | Amend line of canal, and amend policy wording as appropriate.  |
| Additional key development considerations requested by statutory bodies for a number of the allocations  | Following further discussions with statutory bodies, where appropriate additional key development considerations will be added into the document.  |
| Development industry questioned the deliverability of a number of the allocations, such as Rugeley Power Station.  | The proposed allocated sites are being promoted through the Local Plan process and are considered deliverable within the plan period. In relation to Rugeley Power Station, the Council has worked closely with the landowner to prepare a Development Brief SPD to guide the future redevelopment of the site.  |
| The need for a vision/ plan within Burntwood was identified  | Noted, this is a matter that should be addressed through the Local Plan Review.  |
| Local Plan Allocations document undermines the Neighbourhood Plan process, particularly in relation to the Shenstone Neighbourhood Plan                  | The Neighbourhood Plan for Shenstone seeks to contribute toward addressing the housing needs for the development area by providing a minimum of 50-150 new dwellings within the plan period. The Neighbourhood Plan allocates Land at Lynne Lane for 50 units (Policy HA1). This site is allocated within the Local Plan Allocations (Site Reference S1) which makes specific reference towards Policy HA1 in the Key Development Considerations, alongside two additional sites to take the quantum of development in Shenstone up to 150 dwellings. The proposed Green Belt allocations were identified due to the need to identify land outside of settlement boundaries in order to meet the numbers associated with the Local Plan Strategy. A further analysis of the housing supply will be undertaken, taking into account any potential windfalls to re-assess the need for Green Belt release. This may result in the need for Focused changes being consulted on. |

| Key Issue  | Response  |
|--|---|
| The proposal to protect the Borrowpit at Rugeley Power Station was challenged given its allocation in the Local Plan Strategy.   | Rugeley Power Station is allocated to deliver a minimum of 800 dwellings within the plan period. Whilst the Borrowpit is allocated as part of the Local Plan Strategy, the Council consider it is worthy of retention as landscape / water feature and acknowledge within the document there will be a net gain of 350 units on the former Power Station site.          |
| Development industry challenged the approach to calculating housing supply, such as allocations with permission.   | The approach towards calculating supply is considered consistent across the District and as such all sites with permission have been included within the allocations as they are intended to come forward within the plan period and contribute towards meeting the housing provision of 10,030 dwellings set out in the Local Plan Strategy.                           |
| Development industry argue the Local Plan Allocations document makes no allowance for 'safeguarded land' to be taken out of the Green Belt   | The Council is committed to reviewing its Plan in full to address the Greater Birmingham Housing Market Area issues. As part of this review a full Green Belt review will be undertaken to inform the evidence base and therefore at this stage it is not considered necessary for 'safeguarded land' to be taken out of the Green Belt.                                |
| Local concerns over the impact development will have on local infrastructure, services and facilities.   | The Local Plan Allocations document is supported by its evidence base including the Infrastructure Delivery Plan (IDP). The IDP ensures the allocations are robust and deliverable by identifying key strategic infrastructure requirements. Further, the Local Plan Allocations document has been informed by statutory bodies including Staffordshire County Council. |
| Need to deal with neighbouring authority's shortfall in housing provision within the allocations rather than review was cited by numerous respondents  | The Council is committed to reviewing its Plan in full to address housing shortfall issues within the Greater Birmingham Housing Market Area. The outcome of the GL Hearn and Amec Foster Wheeler study is anticipated Autumn 2017 and it is considered appropriate and timely that this will feed into a future full Local Plan Review.                                |
| The need for additional information associated with the following was cited (notably these matters were not considered showstoppers): <ul style="list-style-type: none"> <li>• Flood Risk</li> <li>• Highways England Network</li> <li>• Historic Heritage</li> <li>• HSE</li> </ul> | These matters have been addressed where appropriate within the Key Development Considerations associated with each of the site allocations.   |
| Duty to Cooperate was cited as an issue by numerous parties including Parishes, a neighbouring Local Planning Authority, local residents and the development industry.   | The Council considers it has fulfilled its Duty to Cooperate as part of the Local Plan Allocations process. The Duty to Cooperate Statement prepared as part of the Council's evidence base discusses this further. The Council is committed to ongoing Duty to Cooperate discussions.  |

3.6 Within the representation received, comments (10 in total) were submitted after the deadline. Whilst these comments are not formally taken into consideration they have been noted and summarised for completeness. A full summary of consultation responses can be found at **APPENDIX A and APPENDIX B**. Due to the similarity of a number of the representations officers have where possible grouped representations in the summary document.

- 3.7 Within the representations received, comments (29 in total) were made which related directly to the Sustainability Appraisal that accompanied the Local Plan Allocations Regulation 19. The majority of the comments received focused on requesting changes to sustainability objectives scores allocated against individual sites, some of which were supported by site specific studies. A number of representations then go on to compare and contrast sites with a view to supporting the development sites selected or recommending alternative development options. A number of representations argued that the Sustainability Appraisal failed to assess all of the reasonable alternatives available for development. Representations focused on sites in and around Shenstone raised the relationship between the Sustainability Appraisal that accompanied the recently made Neighbourhood Plan and the Local Plan Allocations Suitability Appraisal. Representations received focused on Burntwood sites offered alternative sustainability objectives scores and commentary taking the opportunity to add a local dimension to the scoring.

#### *Local Plan Allocations – Proposed Focused Changes*

- 3.8 The Local Plan Strategy sets out within adopted Core Policy 1: The Spatial Strategy that a minimum of 10,030 dwellings will be delivered within the plan period up to 2029. The Local Plan Allocations Regulation 19 proposes around 500 dwellings within the Green Belt to ensure the overall housing requirements are met.
- 3.9 In response to the consultation, officers will re-consider the potential housing supply available and review the projections associated with delivering the 10, 030 dwelling figure to establish whether Green Belt release is required. This will take into account any new windfalls. Should this present an opportunity to remove some or all of the Green Belt allocations a ‘Focused Changes’ consultation will be required prior to any submission. These Focused changes will also identify the other suggested changes set out in the summary table 1. This would be in line with Government policy of exploring all options before releasing designated Green Belt land.
- 3.10 A consultation would be required due to the nature of the changes. Removing sites from the submission version is a major modification. It would not be appropriate to submit the Plan and make major modifications. A new consultation would be required to give interested parties the opportunity to comment on the revised version prior to the Examination. There would also be a requirement to undertake an updated Sustainability Appraisal and Habitat Regulation Assessment to inform a revised document.
- 3.11 The document will be referred to as a ‘Focused Changes’ document on the basis that it will simply demonstrate to interested parties where changes have been made to the version the Council most recently consulted on.

#### *Local Development Scheme*

- 3.12 The Local Development scheme requires updating for the following reasons:
- Higher than average responses being received to the consultation has required more officer time than normal to analyse responses
  - The Authority would like to re-consider the housing supply situation
  - The Authority still awaits the Land at Watery Lane High Court challenge decision which may have a bearing on the Allocations document



3.13 This also provides an opportunity for the Authority to demonstrate its commitment to taking forward in due course a full Local Plan review. The proposed timetables for the Local Plan Allocations document and subsequent Local Plan Review are set out below:

Table 2: Local Plan Allocations

| Stage                        | Date                                 |
|------------------------------|--------------------------------------|
| Focused changes consultation | Winter 2017/ Early 2018              |
| Examination in Public        | Summer 2018 (submission Spring 2018) |
| Adoption                     | Winter 2018                          |

Table 3: Local Plan Review

| Stage                 | Date                                 |
|-----------------------|--------------------------------------|
| Issues and Options    | Early 2018                           |
| Preferred Options     | Summer 2018                          |
| Publication           | Autumn 2019                          |
| Examination in Public | Spring 2020 (submission Winter 2019) |
| Adoption              | Winter 2020                          |

3.14 The Local Plan Review timetable addresses a number of responses raised during the consultation period relating to the Lichfield District Council's need to deal with the shortfall arising from the Greater Birmingham Housing Market area. In relation to the Plan Review there is still a significant level of uncertainty associated with the quantum of growth the District will be dealing with. This requires clarification in order to effectively progress with a Plan Review. Therefore the timetable above may need amending were there any delays associated with clarification over the quantum of growth.

|  |   |
|--|---|
| Alternative Options                                | <ol style="list-style-type: none"> <li>1. The Committee recommends a full review of the Local Plan now and wait for the issue of Birmingham's/ Greater Birmingham Housing Market Area shortfall to be addressed.</li> <li>2. The Committee recommends the original draft version of the Local Plan Allocations document (Publication version) be presented to Cabinet for approval and submission.</li> <li>3. The Committee recommends an alternative timetable for both the Local Plan Allocations document and the Local Plan Review be prepared.</li> </ol> |
| Consultation                                       | <ol style="list-style-type: none"> <li>1. Consultation will be required on any major modifications to the Local Plan Allocations.</li> </ol>  |
| Financial Implications                             | <ol style="list-style-type: none"> <li>1. Consultation is required as part of the planning process. It is expected the cost of complying with the recently adopted Statement of Community Involvement (SCI) will give better value than the previous SCI.</li> <li>2. Officer time will be needed to run any additional consultation on the Local Plan Allocations.</li> <li>3. The costs of consultation will be met within approved budgets.</li> </ol>   |
| Contribution to the Delivery of the Strategic Plan | <ol style="list-style-type: none"> <li>1. Supports the priority of a vibrant and prosperous economy as it assists in the delivery of the planning function of the Council.</li> <li>2. Supports the priority of a Healthy and Safe communities by ensuring the provision of housing.</li> <li>3. Supports the priority of Clean, green and welcoming places to live by assisting in allocating land for affordable housing, as well as supporting the</li> </ol>  |

delivery of residential and commercial developments.

Equality, Diversity and Human Rights Implications

1. An Equality Impact Assessment will accompany any consultation on the Local Plan Allocations consultation.

Crime & Safety Issues

1. None.

|   | Risk Description   | How We Manage It   | Severity of Risk (RYG) |
|---|--|--|------------------------|
| A | An approach to the Local Plan is not agreed and there is a lack of clarity associated with how Lichfield District Council continue with meeting its commitments to delivering Site Allocations | Proceed to agree approach to taking forward the Local plan   | Yellow                 |
| B | Moving away from the Local Plan Strategy presents risk at any future Examination in Public.  | Any re consultation on the Plan will identify the issues that are likely to arise at Examinations              | Red                    |
| C | Developments associated with the Greater Birmingham Housing Market Area may impact upon the proposed timetable for the Plan Review   | Officers engage with Duty to Cooperate partners on work relating to the Greater Birmingham Housing Market Area | Yellow                 |

**Background documents:**

Local Plan Strategy 2015  
Statement of Community Involvement  
Local Development Scheme

**Relevant web links:**

**Local Pan Strategy 2015 - <https://www.lichfielddc.gov.uk/Council/Planning/The-local-plan-and-planning-policy/Local-plan/Local-Plan-Strategy.aspx>**

**Statement of Community Involvement - <https://lichfielddc.gov.uk/Council/Planning/The-local-plan-and-planning-policy/Resource-centre/Local-Plan-documents/Statement-of-Community-Involvement-SCI.aspx>**

**Local Development Scheme - <https://www.lichfielddc.gov.uk/Council/Planning/The-local-plan-and-planning-policy/Resource-centre/Local-Plan-documents/Local-Development-Scheme-LDS.aspx>**

## Appendix A – Summary of Representations

| Representation Ref. | Consultee/Agent                                   | Section                                   | Duty to Cooperate | Legally and procedurally Compliant? | Sound? (inclusive of postively prepared, justified, effective and complianc e with NPPF) | Does the respondent suggest changes | Does the respondent wish to appear at EIP | Comment Summary   |
|---------------------|---|---|-------------------|-------------------------------------|--|-------------------------------------|---|---|
| LPA1                | Mr Peter Roberts                                  | 12.5                                      |                   | No                                  | No   |                                     |   | Suggests Land to the rear of 18 Mill End Lane, Alrewas as suitable for housing development for five houses, including the two for which permission has already been given. States the site is deliverable, developable and sustainable.   |
| LPA2                | Mrs Elaine Willett                                | 1.4                                       |                   | No                                  | No   |                                     |   | Disagrees with building on the Green Belt. Suggests bringing forward more brownfield sites for housing development.   |
| LPA3                | Mrs Emma Matthews                                 | 1.3                                       |                   | Yes                                 | No   |                                     |   | Infill development of Burntwood's Green Belt between the Burntwood town and St Matthews estates would have negative impact on existing social and community infrastructures, including schools and doctors and the local road network   |
| LPA4                | Mr Andrew Smith                                   | 1   |                   |                                     | No   |                                     |   | Feels that there is a urgent need for the reopening of the Burntwood to Derby railway line. Concerned about the increase traffic on notorious A38. With many traffic accident spots on this busy stretch of road at Alrewas, Barton, Branston interchange.  |
| LPA5                | Mr & Mrs Brian & Pam Stretton                     | 9   |                   |                                     |  |                                     |   | Disagrees with building on the Green Belt. Suggests building on disused industrial sites. States that housing growth will put too much pressure on existing infrastrucure.  |
| LPA6                | Mr Robert Fenton                                  | 12.17                                     |                   |                                     | No   |                                     |   | Disagrees with releasing Green Belt land in the villages. States that villages are over-allocated and growth should be met at SDAs in Lichfield.  |
| LPA7                | Mr Robert Fenton                                  | 12.19                                     |                   |                                     | No   |                                     |   | In the event that the Planning Inspector deems it appropriate to recommend a Green Belt release at the village of Whittington, we consider that there are less environmentally impacting options available than 'land west of common lane' as set out in draft Policy W1(4)   |
| LPA8                | Theatres Trust - Mr Ross Anthony                  | 8.9                                       |                   | Yes                                 | Yes  |                                     |   | Site L26 (Lichfield 26): Friarsgate, Birmingham Road. It is important that any redevelopment does not impact on the operation of the theatre, particularly in terms of noise and heavy vehicle access to the rear loading dock to get in. We therefore request that an additional point is added to the Key Development Considerations, along the lines of: Design should take in to account the operational needs of the Garrick Theatre, including maintaining heavy vehicle access. This reflects advice in para 70 and 123 of the NPPF relating to the safeguarding of existing cultural facilities   |
| LPA9                | Mr Peter Orgill                                   | 12.19                                     |                   |                                     |  |                                     |   | If Site W4 land allocation does go ahead then the following should happen: 1) the gradient of the field should be significantly reduced so that the houses are not visible from Common Lane approach and the existing houses on Church Street are not overlooked. 2) Alternative parking for the school needs to be provided. 3) The plot of land on Back Lane that was originally being considered for allocation but has now dropped off the list seems to better meet the needs ie flat land , not on a main entry road to the village, has a natural boundary, would not add to the Common Lane traffic problems, would allow more houses to be built. .  |
| LPA10               | Mr & Mrs Richard & Brenda Stewart-Jones           | 12.17                                     |                   | Yes                                 | No   |                                     |   | The development is not appropriate to the village at all. However, accepting that the local authority has to comply with directives from central government in respect of additional housing, and that the village must bear some of the burden, the scale of development needs to be substantially reduced. Credible proposals to improve health, education and traffic infrastructure to cater for the increase in population must be put forward. The impact of HS2 (which will result in long term closure of some roads in and out of the village) and the relocation of the Golf Club cannot simply be ignored. The impact on green belt and the conservation area is not in accordance with the NPPF and should at least be reduced.   |
| LPA11               | Whittington Neighbourhood Group - Mr. Gareth Hyde | Lichfield District Local Plan Allocations |                   | Yes                                 |  |                                     |   | Too much emphasis on Green Belt allocation over brownfield site development in some areas. There are better Green Belt areas in Whittington which could have been used in the allocations document  |
| LPA12               | Whittington Neighbourhood Group - Mr. Gareth Hyde | 12.17                                     |                   | Yes                                 |  |                                     |   | Failed to consider better alternative sites within the Green Belt which would not cause such traffic problems as the Huddlesford Lane site. Traffic cannot access Huddlesford Lane without a demolition of property, new access and a complete revision of Back Lane. Traffic parking is already a problem on this bus route and this would not alleviate it as the proposed new junction would remove the ability for car parking and add pressure on an already congested road system. The land in Huddlesford Lane is not contiguous with the Village, and other sites ignored are more infill sites and would not increase the envelope of the village. The second site in Common Lane next to the school has not been considered and this would be infill between the school and a bungalow. The increase in traffic would be less and there would be scope for assistance with parking at school times. Land off Back Lane by Baxters Farm would yield sufficient numbers with Common Lane to fulfil the LDC allocations without the need for all the access problems off Huddlesford Lane. |
| LPA13               | Mrs Susan Fletcher                                | 9   |                   |                                     |  |                                     |   | Very concerned about the proposed development on land South of Highfields Road and land East of Coulter Lane. Disagrees with building on the Green Belt. Feels that there should be more development on brownfield sites before Green Belt land is allocated.   |
| LPA14               | David Gibson                                      | 9   |                   |                                     |  |                                     |   | Objects to development on land South of Highfields Road. Concerned about the impact it will have on the sewage system and flood risk.   |
| LPA15               | Janet Beeston                                     | 9   |                   |                                     |  |                                     |   | Objects to development on land South of Highfields Road. Concerned about the impact the development will have on traffic levels, air quality and local infrastructure. Notes that there is a stream which flows through the proposed site, which if developed, may heighten the risk of flooding.   |
| LPA16               | Dilys Stokes                                      | 9   |                   |                                     |  |                                     |   | Objects to building on the Green Belt. Concerned about the impact on local infrastructure   |

|       |   |   |  |     |     |  |  |  |
|-------|---|---|--|-----|-----|--|--|--|
| LPA17 | Sharon Beardsmore   | 9   |  |     |     |  |  | Objects to development on land South of Highfields Road. Concerned about the impact on traffic, flooding, loss of farmland and green space and the impact on local infrastructure. Is concerned that the loss of Green Belt will result in the merging of Burntwood and Brownhills   |
| LPA18 | David Rathband  | 9   |  |     |     |  |  | Strongly objects to development at East of Coulter Lane and South of Highfields Road. Does not agree with building on the Green Belt. Concerned about the pressure the development will put on roads, local schools, the emergency services and local GP surgeries. Suggests bringing forward brownfield sites instead.  |
| LPA19 | Pauline Rathband  | 9   |  |     |     |  |  | Strongly objects to development at East of Coulter Lane and South of Highfields Road. Does not agree with building on the Green Belt. Concerned about the pressure the development will put on roads, local schools, the emergency services and local GP surgeries. Suggests bringing forward brownfield sites instead.  |
| LPA20 | Helen Fuller  | 9   |  |     |     |  |  | Strongly objects to development on the Green Belt, particularly at Coulter Lane. Is concerned about the loss of greenspace to wildlife and local residents for recreational use. States that the roads in this area are inadequate and would not be able to cope with the increase in traffic. Suggests that brownfield sites are developed first.   |
| LPA21 | Miss Hannah Shepherd  | 9   |  |     |     |  |  | Objects to the proposed development at Land South of Highfields Road. Does not agree with building on the Green Belt as it acts as a buffer between Burntwood, the M6 Toll and Brownhills. Concerned about the loss of countryside views and the impact on local infrastructure.   |
| LPA22 | Mrs Mandy Burbey  | 9   |  |     |     |  |  | Very concerned about the development on Green Belt land at Coulter Lane. The lane is not wide enough to cope with the extra traffic and there could be accidents   |
| LPA23 | Victoria Whitehouse   | 9   |  |     |     |  |  | Does not agree with building on Green Belt land. Concerned about the impact that construction and development will have on her health. Is worried about the extra traffic and the lack of local infrastructure in the area.  |
| LPA24 | Gill Perkins  | 9   |  |     |     |  |  | Objects to building on Green Belt land and suggests developing brownfield sites instead.   |
| LPA25 | Mr Steve Cowley   | 9   |  |     |     |  |  | Objects to removing land from the Green Belt. Suggests developing brownfield sites, particularly the Blue Hoardings site. Is concerned about the loss of green space and impact on local infrastructure.   |
| LPA27 | Mr Ian Yapp   | Lichfield District Local Plan Allocations |  | No  | No  |  |  | Shenstone Parish Council were not consulted. The Shenstone Neighbourhood Plan states that sites 2 and 3 are not suitable for housing. Suggests that site 1 - Lynne Lane could accommodate further housing.   |
| LPA28 | Canal & River Trust - Mr Ian Dickinson                        | 12.5                                      |  |     |     |  |  | Delete Site A5 : land east of A513/south of Bagnall Lock from the list of sites to be allocated within the document. Bridge 49 is owned and maintained by the Canal & River Trust; the road over it is not public highway. The bridge has a narrow deck with insufficient width for two vehicles to pass; forward visibility when approaching the bridge from either direction is also limited, and there is only limited space available for vehicles to pull over on the bridge approaches to allow vehicles already crossing the bridge to pass.  |
| LPA29 | Mr R Gardner  | 12.16                                     |  |     |     |  |  | Objects to building on Green Belt land adjacent to Lynn Lane. Concerned about the extra traffic this would cause. Is also concerned about the risk of flooding.  |
| LPA30 | Victoria Whitehouse   | 9   |  |     |     |  |  | Lists 8 actions to save the planet from World Earth Day's website. States that building on Burntwood's Green Belt is in direct contravention of these points.  |
| LPA31 | Mrs Ruth Marion Cooper  | 9   |  |     |     |  |  | Concerned about the proposed development at Coulter Lane and Highfields Road. Is very worried about Abnalls Lane becoming a rat run and the dangers of increased traffic in Hammerwich village   |
| LPA32 | Ray & Eleanor Lloyd   | 12.17                                     |  |     |     |  |  | Concerned about the proposed development at Land west of Common Lane, particularly the impact it will have on loss of light to their property, drainage and increased traffic.   |
| LPA33 | Terence Lee   | 12.16                                     |  |     |     |  |  | Objects to the proposed developments off Millbrook Drive and land adjacent to Shenstone Pumping Station, Lynn Lane. Is concerned about the impact the developments would have on the pleasant country views, wildlife habitats, flooding and increased traffic.  |
| LPA34 | Carol Eyles   | 12.16                                     |  |     |     |  |  | Concerned about the impact development at Millbrook Drive and Lynn Lane will have on flooding.   |
| LPA35 | Cannock Chase AONB Unit - Mrs Ruth Hytch. Agent - Clive Keble | 6   |  | Yes | Yes |  |  | The AONB Partnership supports the inclusion of Policy NR10. No modifications are needed to the wording of the policy NR10 but in the explanatory text (6.6) line 3, reference is made to: " long term management of the site and the accessibility of the site. " The AONB is not, strictly speaking, a site and it would be better referred to as the "Designated area" e.g., " long term management of the designated area and the accessibility of the AONB "   |
| LPA36 | Phil Jones  | 12.14                                     |  | No  | No  |  |  | The LDC objective assessment of site S3 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan a professional sustainability evaluation demonstrated that the site S3 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S3 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S3 was not suitable for new house building. |
| LPA37 | Mrs Lorraine Allport  | 9   |  |     |     |  |  | Objects to building on Green Belt land at Highfields Road, Burntwood. Concerned about noise levels from the M6 Toll and the increased traffic in the local area  |
| LPA38 | Mr Philip Walker  | 12.14                                     |  | No  | No  |  |  | Objects to the development at site S3 due to flooding issues and increased traffic. The existing resident endorsed and Neighbourhood Plan agreed and approved 2.1 hectares of land at Shenstone Business Park, Lynn Lane, Shenstone. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014.  |

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| LPA39  | Mr Philip Walker       | 12.16 |  | No | No |  |  | The Shenstone Neighbourhood Plan Sustainability Appraisal concluded that the adverse environmental impact, loss of agricultural land, adverse ecological impact and adverse landscape impact all pointed to the exclusion of S2 as a site for new house building. The NP Appraisal in 2015 as has been stated earlier rigorously followed the National and Local Planning guidelines and was approved by external examination and by LDC following. The removal of S2 would allow further investigation of the potential of the Shenstone Business Park sites opposite.  |
| LPA40  | deleted rep            |       |  |    |    |  |  |  |
| LPA41  | Mr John Callaghan      | 12.14 |  | No | No |  |  | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building                            |
| LPA42  | Mr John Callaghan      | 12.14 |  | No | No |  |  | Objects to the development at site S3 due to flooding issues and increased traffic. The existing resident endorsed and Neighbourhood Plan agreed and approved 2.1 hectares of land at Shenstone Business Park, Lynn Lane, Shenstone. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014.  |
| LPA43  | Mrs Virginia Callaghan | 12.14 |  | No | No |  |  | Objects to the development at site S3 due to flooding issues and increased traffic. The existing resident endorsed and Neighbourhood Plan agreed and approved 2.1 hectares of land at Shenstone Business Park, Lynn Lane, Shenstone. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014.  |
| LPA45  | Peter Gravestock       | 12.14 |  | No | No |  |  | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building                            |
| LPA46  | Peter Gravestock       | 12.14 |  | No | No |  |  | Objects to the development at site S3 due to flooding issues and increased traffic. The existing resident endorsed and Neighbourhood Plan agreed and approved 2.1 hectares of land at Shenstone Business Park, Lynn Lane, Shenstone. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014.  |
| LPA47  | Matthew Ellis          | 12.14 |  | No | No |  |  | The council's objective assessment of site S3 is undermined by the council previously accepting the 2015 draft Shenstone Neighbourhood Plan because professional sustainability evaluation demonstrated that proposed site S3 was not suitable for new house building  |
| LPA48  | Matthew Ellis          | 12.14 |  | No | No |  |  | The council's objective assessment of site S2 is undermined by the council previously accepting the 2015 draft Shenstone Neighbourhood Plan because professional sustainability evaluation demonstrated that proposed site S2 was not suitable for new house building. The Local Allocations Plan document has not considered releasing more land for new housing adjacent to the existing resident endorsed and Neighbourhood Plan agreed/approved 2.1 hectares of land at Shenstone Business Park. 80% of the residents of Shenstone in the Neighbourhood Plan Submission of Evidence were supportive of the use of the Business Park for new housing in 2014. |
| LPA49  | Samuel Finnikin        | 12.14 |  | No | No |  |  | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building                            |
| LPA50  | Samuel Finnikin        | 12.14 |  | No | No |  |  | Objects to the development at site S3 due to flooding issues and increased traffic. The existing resident endorsed and Neighbourhood Plan agreed and approved 2.1 hectares of land at Shenstone Business Park, Lynn Lane, Shenstone. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014.  |
| LPA 51 | Stuart Woodley         | 12.14 |  | No | No |  |  | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building                            |
| LPA 52 | Stuart Woodley         | 12.14 |  | No | No |  |  | Objects to the development at site S3 due to flooding issues and increased traffic. The existing resident endorsed and Neighbourhood Plan agreed and approved 2.1 hectares of land at Shenstone Business Park, Lynn Lane, Shenstone. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014.  |
| LPA 53 | Alison Woodley         | 12.14 |  | No | No |  |  | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building                            |

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| LPA 54 | Alison Woodley   | 12.14 |  | No | No |  |  | Objects to the development at site S3 due to flooding issues and increased traffic. The existing resident endorsed and Neighbourhood Plan agreed and approved 2.1 hectares of land at Shenstone Business Park, Lynn Lane, Shenstone. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014.   |
| LPA55  | Mike Fletcher    | 12.14 |  | No | No |  |  | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building |
| LPA56  | Mike Fletcher    | 12.14 |  | No | No |  |  | Objects to the development at site S3 due to flooding issues and increased traffic. The existing resident endorsed and Neighbourhood Plan agreed and approved 2.1 hectares of land at Shenstone Business Park, Lynn Lane, Shenstone. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014.   |
| LPA57  | Cllr Paul Ray    | 8     |  |    |    |  |  | We do not have any specific objections to any of the allocated sites in Lichfield except the former Norgren site, Eastern Avenue. Concerns about lack of affordable housing and impact on viability of Friarsgate   |
| LPA58  | Mrs Bronwen Ross | 12.14 |  | No | No |  |  | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building |
| LPA 59 | Mrs Bronwen Ross | 12.14 |  | No | No |  |  | Objects to the development at site S3 due to flooding issues and increased traffic. The existing resident endorsed and Neighbourhood Plan agreed and approved 2.1 hectares of land at Shenstone Business Park, Lynn Lane, Shenstone. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014.   |
| LPA 60 | Mr Robert Grundy | 9     |  |    |    |  |  | Objects to building on Green Belt land at Highfield Road due to increased pressure on infrastructure.   |
| LPA 61 | Miss Faye Grundy | 9     |  |    |    |  |  | Objects to building on Green Belt land at Highfield Road due to increased pressure on infrastructure.   |
| LPA 62 | Mr John Davis    | 12.14 |  |    |    |  |  | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building |
| LPA 63 | Mr John Davis    | 12.14 |  |    |    |  |  | Objects to the development at site S3 due to flooding issues and increased traffic. The existing resident endorsed and Neighbourhood Plan agreed and approved 2.1 hectares of land at Shenstone Business Park, Lynn Lane, Shenstone. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014.   |
| LPA 64 | Margaret Young   | 12.14 |  |    |    |  |  | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building |
| LPA 65 | Margaret Young   | 12.14 |  |    |    |  |  | Objects to the development at site S3 due to flooding issues and increased traffic. The existing resident endorsed and Neighbourhood Plan agreed and approved 2.1 hectares of land at Shenstone Business Park, Lynn Lane, Shenstone. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014.   |
| LPA 66 | Roy Young        | 12.14 |  |    |    |  |  | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building |
| LPA 67 | Roy Young        | 12.14 |  |    |    |  |  | Objects to the development at site S3 due to flooding issues and increased traffic. The existing resident endorsed and Neighbourhood Plan agreed and approved 2.1 hectares of land at Shenstone Business Park, Lynn Lane, Shenstone. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014.   |
| LPA 68 | Barbara Boffy    | 12.14 |  |    |    |  |  | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building |

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| LPA 69 | Barbara Boffy                           | 12.14 |    |    |  |  |  | Objects to the development at site S3 due to flooding issues and increased traffic. The existing resident endorsed and Neighbourhood Plan agreed and approved 2.1 hectares of land at Shenstone Business Park, Lynn Lane, Shenstone. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014.   |
| LPA 70 | Peter Boffy                             | 12.14 |    |    |  |  |  | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building |
| LPA 71 | Peter Boffy                             | 12.14 |    |    |  |  |  | Objects to the development at site S3 due to flooding issues and increased traffic. The existing resident endorsed and Neighbourhood Plan agreed and approved 2.1 hectares of land at Shenstone Business Park, Lynn Lane, Shenstone. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014.   |
| LPA72  | Sharon Jones                            | 12.14 |    |    |  |  |  | Objects to the development at site S3 due to flooding issues and increased traffic. The existing resident endorsed and Neighbourhood Plan agreed and approved 2.1 hectares of land at Shenstone Business Park, Lynn Lane, Shenstone. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014.   |
| LPA73  | Jean Burton<br>(Alrewas Parish Council) | 12.15 | No | No |  |  |  | The proposal will exceed the capacity of the infrastructure of the existing community. The facilities of the village will not cope. Therefore it is not sustainable.  |
| LPA 74 | Emily Roberts                           | 12.14 | No | No |  |  |  | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building |
| LPA 75 | Emily Roberts                           | 12.14 | No | No |  |  |  | Objects to the development at site S3 due to flooding issues and increased traffic. The existing resident endorsed and Neighbourhood Plan agreed and approved 2.1 hectares of land at Shenstone Business Park, Lynn Lane, Shenstone. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014.   |
| LPA 76 | Lynn Hill                               | 9     |    |    |  |  |  | Objects to building on Green Belt land in Burntwood and Hammerwich due to increased pressure on local infrastructure. Suggests that the land alongside Highfields Road could be used as a 9 hole golf course, an extension to the country park with a children's farm, solar panel farm or arable farm.   |
| LPA 77 | Anthony Marks                           | 12.14 | No | No |  |  |  | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building |
| LPA 78 | Anthony Marks                           | 12.14 | No | No |  |  |  | Objects to the development at site S3 due to flooding issues and increased traffic. The existing resident endorsed and Neighbourhood Plan agreed and approved 2.1 hectares of land at Shenstone Business Park, Lynn Lane, Shenstone. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014.   |
| LPA 79 | Diane Marks                             | 12.14 | No | No |  |  |  | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building |
| LPA 80 | Diane Marks                             | 12.14 | No | No |  |  |  | Objects to the development at site S3 due to flooding issues and increased traffic. The existing resident endorsed and Neighbourhood Plan agreed and approved 2.1 hectares of land at Shenstone Business Park, Lynn Lane, Shenstone. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014.   |
| LPA 81 | Rachael Capper                          | 12.14 | No | No |  |  |  | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building |
| LPA 82 | Rachael Capper                          | 12.14 | No | No |  |  |  | Objects to the development at site S3 due to flooding issues and increased traffic. The existing resident endorsed and Neighbourhood Plan agreed and approved 2.1 hectares of land at Shenstone Business Park, Lynn Lane, Shenstone. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014.   |



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| LPA 83 | Russell Capper                     | 12.14 |     | No | No |     |     | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan that a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building   |
| LPA 84 | Russell Capper                     | 12.14 |     | No | No |     |     | Objects to the development at site S3 due to flooding issues and increased traffic. The existing resident endorsed and Neighbourhood Plan agreed and approved 2.1 hectares of land at Shenstone Business Park, Lynn Lane, Shenstone. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014.  |
| LPA 85 | Cathy Cutting                      | 12.14 |     | No | No |     |     | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan that a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building   |
| LPA 86 | Cathy Cutting                      | 12.14 |     | No | No |     |     | Objects to the development at site S3 due to flooding issues and increased traffic. The existing resident endorsed and Neighbourhood Plan agreed and approved 2.1 hectares of land at Shenstone Business Park, Lynn Lane, Shenstone. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014.  |
| LPA 87 | Kate Brinkworth                    | 12.16 |     |    |    |     |     | Object to development on land adjacent to the Lammas Land in Shenstone. Adjacent land is a key asset to the village used for running and walking. To build along it would change the nature of this tranquil spot. There is precious little space like this as it is, urge you to protect it for future generations.   |
| LPA 88 | Ken Oginsky                        | 12.14 |     | No | No | Yes | No  | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan that a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building   |
| LPA 89 | Ken Oginsky                        | 12.14 | No  | No | No | Yes | No  | Objects to the development at site S3 due to flooding issues and increased traffic. The existing resident endorsed and Neighbourhood Plan agreed and approved 2.1 hectares of land at Shenstone Business Park, Lynn Lane, Shenstone. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014.  |
| LPA 90 | Patricia Oginsky                   | 12.14 | No  | No | No | Yes | No  | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan that a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building   |
| LPA 91 | Patricia Oginsky                   | 12.14 | No  | No | No | Yes | No  | Objects to the development at site S3 due to flooding issues and increased traffic. The existing resident endorsed and Neighbourhood Plan agreed and approved 2.1 hectares of land at Shenstone Business Park, Lynn Lane, Shenstone. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014.  |
| LPA 92 | Robert Share                       | 12.14 | No  | No | No | Yes | No  | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan that a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building   |
| LPA 93 | Robert Share                       | 12.14 | No  | No | No | Yes | No  | Objects to the development at site S3 due to flooding issues and increased traffic. The existing resident endorsed and Neighbourhood Plan agreed and approved 2.1 hectares of land at Shenstone Business Park, Lynn Lane, Shenstone. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014.  |
| LPA 94 | Clare Eggington (Cannock Chase DC) | 2.2   | Yes |    |    | No  | Yes | The Council supports the approach to safeguarding the route of the Lichfield Canal as set out in Policy IP2 and the statement in paragraph 2.2. which references the need for further work in terms of avoiding any impacts upon the Cannock Extension Canal SAC. This is considered to be consistent with the approaches taken by other Local Authorities affected by the route.  |
| LPA 95 | Clare Eggington (Cannock Chase DC) | 12.13 | Yes |    |    |     | Yes | Policy GT1 is supported. Lichfield District Council has written to Cannock Chase Council asking for assistance in meeting its need. Cannock Chase Council replied on 4 th April 2017 advising that it was currently trying to address its own needs which are significant for such a small and tightly constrained district (41 Gypsy and Traveller plots, 5 transit plots and 4 Travelling Showpeople plots) furthermore Cannock Chase District is already reliant upon Lichfield to deliver some of its housing need. Notwithstanding this, Cannock Chase Council has only recently finished consulting on its Issues and Options document (Local Plan Part 2: Allocations Plan) and therefore may need to provide an update once the representations have been analysed. This work has not been completed at the time of providing this representation but could be provided in due course. |
| LPA 96 | Clare Eggington (Cannock Chase DC) | 1.10  | Yes |    |    |     | Yes | Cannock Chase Council continues to engage constructively with Lichfield District Council on a range of cross boundary matters under the Duty to Co-operate. Cannock Chase Council supports the approach undertaken by the Allocations Plan including the commitment in paragraph 1.10 and 4.7 to a full review of the plan to address the housing shortfall in the GBHMA.  |

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| LPA 97  | Clare Eggington<br>(Cannock Chase DC)                    | 11.1  | Yes |    |    |     | Yes | Cannock Chase welcomes and supports the ongoing commitment of Lichfield District Council to deliver 500 homes to meet the needs of Rugeley. Cannock Chase Council supports Chapter 11 and Policy R1. It is noted that LDC employment site reference '9' (LDC Employment Land Capacity Assessment 2016 site ref), is not proposed to be taken forward for allocation for employment uses at this time. This approach is understood and supported in the wider context of the ongoing work on the adjacent power station site. However, it should be noted that LDC employment site reference '9' is part of a cross boundary site with CCDC (CCDC site ref RE3) which had outline planning consent for employment uses (CH/03/0378 granted Sept 2005). Given that a shortfall in employment land is flagged in CCDC's Issues and Options document it is requested that LDC retains a flexible approach to employment site ref '9' and that the two authorities continue to work together to secure an appropriate use, which may ultimately mean that CCDC allocates its part of that site |
| LPA 98  | Alex Yendole -<br>Stafford Borough Council               | 1.10  |     |    |    |     |     | There are no proposals that will adversely affect Stafford Borough. The Council notes the future requirement to meet the needs of the Birmingham HMA arising from Tamworth Borough's shortfall and agrees that this issue should be considered through the wider HMA context through a review of the Local Plan. The Council would appreciate continued dialogue on the issue through the DtC process.  |
| LPA 99  | Clare Eggington<br>(Cannock Chase DC)                    | 1.1   | Yes |    |    |     | Yes | Cannock Chase Council appreciates that the 2016 supplementary Green Belt Review is a partial review specifically undertaken to inform the allocations process which focuses upon edge of settlement options in line with the Local Plan Strategy. However it is important that a full review is undertaken to inform the review of the Local Plan and Cannock Chase Council welcomes the commitment to this as set out in paras 1.10 and 4.7 (ie that the review will be informed by a comprehensive review of the evidence base). Further detail is provided in paragraph 1.1 of the Supplementary Green Belt Review 2016 which explains its targeted role and states: 'the report should be considered a technical supplement to existing evidence rather than a comprehensive Green Belt review. Any such comprehensive review will be undertaken as part of the evidence supporting any plan review.' This approach is supported.   |
| LPA 100 | Dr Peter Hedges  | 12.14 | No  | No | No | Yes | No  | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building   |
| LPA 101 | Dr Peter Hedges  | 12.14 | No  | No | No | Yes | No  | Objects to the development at site S3 due to flooding issues and increased traffic. The existing resident endorsed and Neighbourhood Plan agreed and approved 2.1 hectares of land at Shenstone Business Park, Lynn Lane, Shenstone. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014.   |
| LPA 102 | Mrs Elisabeth Larner                                     | 12.14 | No  | No | No | Yes | No  | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building   |
| LPA 103 | Mrs Elisabeth Larner                                     | 12.14 | No  | No | No | Yes | No  | Objects to the development at site S3 due to flooding issues and increased traffic. The existing resident endorsed and Neighbourhood Plan agreed and approved 2.1 hectares of land at Shenstone Business Park, Lynn Lane, Shenstone. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014.   |
| LPA 104 | Dr Trevor Davies   | 12.14 | No  | No | No | Yes | No  | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building   |
| LPA 105 | Charlotte Whitworth                                      | 9.9   |     |    |    |     |     | Objects to plans to build 480 houses on the green belt by Coulter Lane. The green belt is continuously shrinking and the day will come when there are no gaps between cities. Written a poem to express the terrors of what might come.   |
| LPA 106 | Dr Trevor Davies   | 12.14 | No  | No | No | Yes | No  | Objects to the development at site S3 due to flooding issues and increased traffic. The existing resident endorsed and Neighbourhood Plan agreed and approved 2.1 hectares of land at Shenstone Business Park, Lynn Lane, Shenstone. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014.   |
| LPA 107 | Pauline Davies   | 12.14 | No  | No | No | Yes | No  | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building   |
| LPA 108 | Pauline Davies   | 12.14 | No  | No | No | Yes | No  | Objects to the development at site S3 due to flooding issues and increased traffic. The existing resident endorsed and Neighbourhood Plan agreed and approved 2.1 hectares of land at Shenstone Business Park, Lynn Lane, Shenstone. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014.   |
| LPA 109 | Margaret Jones<br>(Wigginton &<br>Hopwas Parish Council) | 10.1  |     |    |    |     |     | With reference to the section on North of Tamworth in the Allocations Document, Wigginton and Hopwas Parish Council reiterates its opposition to the building of 1000 homes at Arkall Farm until the appropriate infrastructure has been put in place. The Council does not believe that the current road network, even with the minor improvements recently put in place, can support this amount of building, which was recently approved by the Planning Committee in spite of considerable local opposition. This location is therefore not sustainable without the provision of a relief road.   |
| LPA 110 | deleted rep  |       |     |    |    |     |     |   |

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| LPA 111 | Adrian Oliver   | Policy S1: Shenstone Housing Allocations | No  | No  | No  | Yes  | No  | Objects to the development at site S3 due to LDC previously accepting that the site was not suitable for new house building as part of Shenstone's Neighbourhood Plan. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014. LDC have failed in DtC duties as they have not ensured evidence is locally derived and failed to consider an approved Neighbourhood Plan  |
| LPA 112 | Kathryn Young (Turley) on behalf of Antony Rowan (David Wilson) | 10.1                                     | No  | Yes | No  | Allocate further sites to the shortfall arising from the wider HMA. Promotes land to the south west of Limburg Avenue, Lichfield as a sustainable location for the future growth of the City. The land is controlled by a house builder and subject to the site being removed from the Green Belt it could begin to deliver housing immediately. | Yes | <p>The Local Plan Allocations Document does not comply with DtC. Further evidence is required to demonstrate that Lichfield District Council has co-operated meaningfully with its neighbours, particularly Tamworth, Birmingham and North Warwickshire and as a result more sites are likely to be required to be allocated.</p> <p>The Inspectors report to the Tamworth Local Plan confirms Tamworth's residual shortfall will be shared between Lichfield and North Warwickshire. Para 181 of NPPF requires LPA to demonstrate evidence of effectively cooperating to plan for issues with cross-boundary impacts and until there is clear evidence of this and that LDC honours the commitment to accommodate some of Tamworth's residual shortfall then the plan does not meet the DtC.</p> <p>The Local Plan document is not positively prepared. Local Plans need to meet the full objectively assessed housing need including unmet housing requirements from neighbouring authorities. Birmingham's shortfall is to be distributed between 12 HMA authorities including Lichfield. The Local Plan Allocations is inconsistent with the Local Plan Strategy as it does not meet identified objectively assessed housing needs and is not positively prepared. Careful consideration needs to be given to the wider context and distribution of housing across the HMA to ensure the Allocations document is positively prepared.</p> <p>The Local Plan document is not considered effective as there is insufficient evidence to demonstrate that the Council has explored all available options to work on cross-boundary strategic priorities.</p> <p>The Local Plan document is not considered to be consistent with NPPF as there are available sites which can deliver residential development within the administrative boundary of LDC that should be allocated to deliver housing that is required within LDC boundary and to meet the needs of Tamworth and the wider area.</p> |
| LPA113  | Philip. G. Sharpe (Inland Waterways Association)                | 2.2                                      | No  | Yes | Yes | Yes  | No  | The final sentence of para. 2.2: "Since the adoption of the Local Plan Strategy further work has been undertaken by the Lichfield and Hatherton Canal Restoration Trust (LHCRT) which has identified an alternative route which seeks to avoid impact upon the Special Area of Conservation however this will need further studies to establish." is misleading and should be modified. It was the Hatherton Canal that was re-routed to avoid impacting the Cannock Extension Canal SAC, which is not relevant to this policy. The Lichfield Canal route has never had any connection with or possible effect on the SAC. The further work undertaken relates to the water supply study. The Duty to Co-operate with adjacent councils should have clarified the distinction between the two separate canals being restored by LHCRT, the Hatherton Canal in Cannock, South Staffordshire and Walsall districts, and the Lichfield Canal which is entirely within Lichfield District.  |
| LPA 114 | Philip. G. Sharpe (Inland Waterways Association)                | Local Plan Allocations Consultation      | Yes | Yes | Yes | Yes  | No  | The Handsacre Link section of the HS2 Route is incorrectly shown on the Policies Map key plan as crossing the Trent & Mersey Canal in 2 places around Woodend. This earlier route proposal was changed by Additional Provision 2 in 2015 at the request of the Inland Waterways Association and the Canal & River Trust to avoid these canal crossings. Correct the alignment of the HS2 route on the Policies Map to that in AP2 and the final authorised route.   |
| LPA 115 | Philip. G. Sharpe (Inland Waterways Association)                | Local Plan Allocations Consultation      | Yes | Yes | Yes | Yes  | No  | The policy should include reference to essential infrastructure provision. Although the details are covered in the Infrastructure Delivery Plan for the 3 South Lichfield SDAs this does not carry the same weight as a policy, and also does not cover the remainder of the route where other developments may conceivably be proposed within the lifetime of the Plan. The provision of essential new infrastructure, e.g. access bridges over the canal route, should be referenced in the policy to make it clear to developers that the canal route safeguarding needs not only passive provision but may require physical infrastructure. After the first sentence of Policy IP2: Lichfield Canal add: "Development on or adjacent to the route should provide any infrastructure necessary to maintain the integrity of the route."  |

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| LPA 116 | Adrian Oliver                  | 12.14 - 12.16          | No  | No  | No | Yes | No | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building   |
| LPA 117 | Terence Lee                    | Site S2 (Shenstone)    | No  | No  | No | Yes | No | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building   |
| LPA 118 | Maggie Taylor (Sport England)  | Local Plan Allocations | Yes | Yes | No | Yes | No | L27 should not constrain the use of Lichfield City Football Club site by introducing noise sensitive residential properties. B3 - Confirm the requirement for playing field replacement. NT1 - Will generate a need for additional sports facilities and cross boundary co-operation. The location may mean raising planning contributions in Lichfield but spending them in Tamworth. R1 - The plan fails to recognise the existence of a community sports facility on site  |
| LPA 119 | Mandy Bates                    | 12.14                  |     |     |    |     |    | Objects to the proposed housing development on Court Drive, Shenstone. The land should remain green belt. There is unused brown belt land available so this directly contravenes the Shenstone/ LDC NP. Giving this permission would make a village into a town.  |
| LPA 120 | Terence & Ruth Cox             | Burntwood              |     |     |    |     |    | Objects to removal of land surrounding Burntwood from the Green Belt ie Site B14 and Site B14. Burntwood has been allowed to sprawl across green land for several decades now time to protect Green Belt and use infill sites. The infrastructure is inadequate and roads in poor conditions and will not be able to cope with increased numbers. Burntwood does not have capacity to support additional people.  |
| LPA 121 | Terence Lee                    | Site S3 (Shenstone)    | No  | No  | No | Yes | No | Objects to the development at site S3 due to LDC previously accepting that the site was not suitable for new house building as part of Shenstone's Neighbourhood Plan. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014. LDC have failed in DTC duties as they have not ensured evidence is locally derived and failed to consider an approved Neighbourhood Plan  |
| LPA 122 | Robert Tompkin                 | Site S2 (Shenstone)    | No  | No  | No | Yes | No | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building   |
| LPA 123 | Robert Tompkin                 | Site S3 (Shenstone)    | No  | No  | No | Yes | No | Objects to the development at site S3 due to LDC previously accepting that the site was not suitable for new house building as part of Shenstone's Neighbourhood Plan. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014. LDC have failed in DTC duties as the have not ensured evidence is locally derived and failed to consider an approved Neighbourhood Plan   |
| LPA 124 | David Pyner (Highways England) | Local Plan Allocations |     |     |    |     |    | Has suggested the following amendments: Site L9: Land off Burton Road (East) Add reference to the need to consider interaction with slip roads when dealing with access arrangements within the 'Key development considerations' section. Suggested wording: 'Suitable access to be provided...that considers the interaction with the A38 slip roads and the transition from dual-carriageway to urban environment.' Site FZ1: Land west of Sir Robert Peel Hospital, Lichfield Street - Add reference to the need to consider the interaction with the A5 boundary with regards to noise and drainage within the 'Key development considerations' section. Suggested wording: 'Boundary treatment along the A5 should be considered in consultation with Highways England, to determine matters such as drainage, noise and fencing' R1: Former Rugeley Power Station - Add reference to the need to encourage the use of existing and improved sustainable transport options, particularly for commuting trips into Stafford, Lichfield, Birmingham, which otherwise could place unnecessary pressure on the strategic road network. This should be added to both the allocation summary and the Concept Statement. Suggested wording: 'Rugeley benefits from its location on both the West Coast Main Line and Chase Line. Steps should be taken to encourage journeys to be made by rail, for example by providing bus links, and walking and cycling routes to the existing stations.' EMP1: Land South of Fradley Park - Add reference to the need to consider the interaction with the adjacent A38 Hilliard's Cross junction and the A38 boundary in regards to noise and drainage within the 'Key development considerations' section. Suggested wording: 'Appropriate access to the site should be provided...that considers the interaction with the adjacent A38 Hilliard's Cross junction and does not prevent future improvements being made to the junction (see Policy ST5)' 'Boundary treatment along the A38 should be considered in consultation with Highways England, to determine matters such as drainage, noise and fencing' |

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| LPA 125 | Phil Cotterill  | 12.17  |     |     |     |     |     |  | Objects to building at least 110 houses in Whittington due to increased pressure on local infrastructure. A minimum of another 220 people and cars will have a detrimental effect on the quality of life of the existing villagers, not just more vehicles, longer waiting times at the doctors and over crowding at the school but poorer air quality and loss of green space. The village maybe able to absorb the small developments provided they are built over a period of time and adequate off road parking is made. This should be 3 spaces minimum per property. The proposal for 60 homes on greenbelt should not be considered as it is prime agricultural land and will destroy wildlife habitats, some of which are endangered. It is not clear if this development would mean the loss of the allotments and play area. The village will also have to cope with disruption from constructing HS2. Empty properties in Lichfield should be brought back into use before new homes are built.                                       |
| LPA 126 | Cynthia Lee   | Site S2 (Shenstone)  | No  | No  | No  | Yes | No  |  | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building  |
| LPA 127 | Cynthia Lee   | Site S3 (Shenstone)  | No  | No  | No  | Yes | No  |  | Objects to the development at site S3 due to LDC previously accepting that the site was not suitable for new house building as part of Shenstone's Neighbourhood Plan. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014. LDC have failed in DTC duties as the have not ensured evidence is locally derived and failed to consider an approved Neighbourhood Plan  |
| LPA 128 | Lee Davies  | 12.14  | No  | No  | No  | Yes | No  |  | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building  |
| LPA 129 | Dave Blakemore  | Site S2 (Shenstone)  | No  | No  | No  | Yes | No  |  | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building  |
| LPA 130 | Christopher Timothy (CT Planning) on behalf of Mr P Smith | 12.8   | Yes | Yes | No  | Yes | Yes |  | Policy Arm4 of the Lichfield District Local Plan Strategy 2015 identifies a requirement for some 120- 220 homes within Armitage with Handsacre. Subsequent appeal decisions have indicated that these figures are minimal. Policy AH1 of the Local Plan Allocations document only provides for one site within Armitage with Handsacre and that site does not achieve the minimum housing requirement identified in the strategy (Policy Arm4). It is proposed that the land at Church Farm, Church Lane, Armitage be allocated for housing development. The site comprises of some 0.9 hectares.<br>The site is capable of accommodating up to 25 dwellings and could provide variety in terms of their type, design, size and tenure. The land at Church Farm, Church Lane, Armitage has been promoted throughout the Local Plan process and is included within SHLAA 2016 as suitable, available, achievable and deliverable for development. (Site Ref: 379).  |
| LPA 131 | Dave Blakemore  | Site S3 (Shenstone)  | No  | No  | No  | Yes | No  |  | Objects to the development at site S3 due to LDC previously accepting that the site was not suitable for new house building as part of Shenstone's Neighbourhood Plan. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014. LDC have failed in DTC duties as the have not ensured evidence is locally derived and failed to consider an approved Neighbourhood Plan  |
| LPA 132 | Graham Slight (Alrewas Neighbourhood Plan Steering Group) | Lichfield District Local Plan Allocations (Policies Maps, Inset 4) |     |     | No  | Yes | Yes |  | No requirement for the village settlement boundary for Alrewas shown in Inset 4 to be as large as has been proposed. The housing allocation for Alrewas has been exceeded. The village settlement boundary should exclude the Conservation Area which is bounded by Dark Lane and Essington Farm to the west as it will be the only remaining green space accessible from the village. Village settlement boundary should follow the lines of River Trent and garden boundaries of houses in Cotton Close  |
| LPA 133 | Will Brearley (CT Planning) on behalf of Mr R. Cork       | 8.5  | Yes | Yes | Yes | Yes | No  |  | Endorses the allocation of Site L9. There are no known technical or environmental constraints which would preclude the site from going forward and the proposed housing allocation for some 20 dwellings is supported. The development of the site will make good use of under-used land which is too small for commercial agricultural purposes and does not serve an important visual or recreational role as open space. There are also no ecological constraints that would prohibit the development of the site. The site can be safely accessed along the Burton Road frontage without undue harm to highway safety or the free flow of traffic. A Noise Survey has been undertaken and demonstrates that the A38 does not create an unsuitable environment for new homes, subject to design and layout. The site is evidently located within a sustainable location with there being easy access to a wide range of community and social facilities; where there is a need to travel, there is an option of doing so by public transport. |

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| LPA 134 | Kevin Hession   |                      | 9  |  |    |     | Yes | <p>Objects to development on the Green Belt at Highfields Road. Wants LDC to safeguard Burntwood from being absorbed into the West Midlands conurbation. Suggests that inappropriate industrial sites in residential areas should be re-developed for housing eg. Mount Road and Queens Drive. Also suggests reclaiming vacant retail properties and converting to housing. If this is not possible, LDC should look to alternative green belt sites eg. Land West of Stables Way and bounded by Old Ironstone Road and Severns Road Chase Terrace.</p> <p>b) Land South of the M6 Toll and north of the A5, bounded by the A5, B5195 Ogle Hay Road and B5195 Burntwood Bypass.</p> <p>c) The large site bounded by Rugeley Road, Nether Lane, Coulter Lane and Church Road Burntwood.</p>   |
| LPA 135 | Rachel Whittaker                                      | Site B14 (Burntwood) |    |  |    |     |     | <p>Objects to the proposed development off Highfields Road, Chasetown due to poor infrastructure locally. The local primary school is at capacity, the health centre is overstretched and the high street is particularly busy with traffic.</p>   |
| LPA 136 | Rosemary Lawrence                                     | 12.14-12.16          |    |  |    |     |     | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. Confused as to why in so short a period after the completion of the Shenstone Neighbourhood Plan, LDC is questioning the exclusion of sites S2 and S3 within the plan and proposing that the sites are suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> |
| LPA 137 | Susan Simcox  | Site B14 (Burntwood) |    |  |    |     |     | <p>Objects to the proposed development on Greenbelt off Highfields Road. Want to keep what little greenery and nature we have. Must be other wasteland sites to build on.</p>  |
| LPA 138 | Mrs S Afzal   | 9 Burntwood          |    |  |    |     |     | <p>Strongly protests the plans of LDC to build on the Green Belt. All part and parcel of their general attitude to village areas. First the bus service and now this. Lives not far from the proposed area.</p>  |
| LPA 139 | Janet Hodson (JVH Planning) on behalf of Aucott Group | 4.6                  | No |  | No | Yes | Yes | <p>There should be a review of the 2015 Strategy to take into account the further development that will be required to meet Birmingham's housing shortfall. The LPA makes no allowance for " safeguarded land " to be taken out of the green belt to meet future needs or make provision for reserve sites. Does not believe the Plan provides for a robust 5 year land supply. Suggests increasing the flexibility allowance to 20% and allocating more smaller sites which can be developed more speedily. Suggests Fazeley land allocations should incorporate Bonehill Mill, which would require the green belt boundary to be moved up to the canal in the north.</p>   |
| LPA 140 | Rachel Stych  | Site B14 (Burntwood) |    |  |    |     |     | <p>Objects to development off Highfields Road between existing houses and toll road. There are not enough green areas or natural wildlife corridors as it is.</p>  |

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| LPA 141 | Sophie Baggot                            | 12.14-12.16<br>Site S3                            | No  | No  | No  | Replace,<br>revise or<br>amend LDC<br>Local Plan SA<br>conclusions for<br>site S3 with<br>the Shenstone<br>NP<br>Sustainability<br>Appraisal.<br><br>Removal of S3<br>would allow<br>further<br>investigation of<br>the potential of<br>Shenstone<br>Business Park | No | <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself on page 24 of ensuring that evidence collected to support the SA is locally derived (b) it has not identified or considered in the SA that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of site S3 and ruled it out for new house building (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>The LDC objective assessment of site S3 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan a professional sustainability evaluation demonstrated that the site S3 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S3 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S3 was not suitable for new house building.</p> <p>Consider other alternative strategy of releasing more land for housing adjacent to the existing Neighbourhood Plan approved 2.1 ha land at Shenstone Business Park (Site S1). SHLAA shows the whole of the Business Park as "developable" and this could have been explored further in the LPA document.</p> <p>The Neighbourhood Plan process resulted in Site S3 being rejected for the building of new homes and LDC approved these April 2016 conclusions.</p>  |
| LPA 142 | Stimson                                  | 9   |     |     |     |  |    | Objects to any building on Green Belt land at Burntwood due to infrastructure being unable to support LDC's proposals.   |
| LPA 143 | Sophie Baggot                            | 12.14-12.16<br>Site S2                            | No  | No  | No  | Yes  |    | <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself on page 24 of ensuring that evidence collected to support the SA is locally derived (b) it has not identified or considered in the SA that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of site S2 and ruled it out for new house building (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>LDC have not met their procedural requirement under the cooperation obligations required in the Localism Act in that they have not (i) as the submitting authority demonstrated effective cooperation with the Parish Council as the accountable body for the Shenstone Neighbourhood Plan (ii) started amendment discussions early and carried on (iii) arrived at decisions that reflect contrary evidence (iv) worked in partnership with the accountable body for a Neighbourhood Plan. The four reasons listed are identified in the LGA Localism Act Duty to Cooperate good practice guidance Dec 2014.</p> <p>The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan a professional sustainability evaluation demonstrated that the site S3 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S3 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S3 was not suitable for new house building.</p> <p>Consider other alternative strategy of releasing more land for housing adjacent to the existing Neighbourhood Plan approved 2.1 ha land at Shenstone Business Park (Site S1). SHLAA shows the whole of the Business Park as "developable" and this could have been explored further in the LPA document.</p> <p>The Neighbourhood Plan process resulted in Site S2 being rejected for the building of new homes and LDC approved these April 2016 conclusions.</p> |
| LPA 144 | Melanie Lindsley<br>(The Coal Authority) | Local Plan<br>Allocations<br>Document             | Yes | Yes | Yes | Yes  | No | The Coal Authority notes that there is a concentrated area of coal mining legacy on the southern edge of the District, predominantly on the edge of Burntwood. Having considered the allocations proposed it does not appear that any of the sites identified fall within the defined Development High Risk Area. Should any allocations/ developments be proposed in this area consideration should be given to the risks posed by past coal mining activity.   |
| LPA 145 | Jean Simpson                             | Local Plan<br>Allocations<br>Document             | No  | No  | No  | Yes  | No | The new boundary for Alrewas does not take into account the preferences of the inhabitants, the parish council or district Cllrs. States the area for development north of Alrewas should be 50% of that shown and the area to east of Alrewas should be included for development. Concerned additional housing could cause flood risks.   |
| LPA 146 | Paul Glover                              | Policy S1:<br>Shenstone<br>Housing<br>Allocations |     |     |     |  |    | Urge council members to reject the revised plan to restore good faith with the villagers of Shenstone. LDC has ignored the democratic process, the Shenstone NP and the Localism Act in stating that the original Local Plan Allocation is insufficient  |

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| LPA 147 | James Hollyman (Harris Lamb) on behalf of Davy Developments Ltd | S1                                       | Yes | Yes | No | Yes | Yes | <p>Welcomes the Council's aim to provide allocations to meet the upper limit of the housing range for Shenstone.</p> <p>Concerns about the deliverability of proposed allocation S1 - Land at Lynn Lane. Policy EMP2 seeks to protect existing industrial uses within the district and Para 22 of NPPF requires there to be 'no reasonable prospect' of land remaining in employment use before it is considered for alternative uses. Concerns relating to flood risk, noise, density of design and access in relation to the allocation Site S1.</p> <p>Promotes land off Court Drive as a more suitable and deliverable site for a range of house types, in particular retirement homes and affordable homes to satisfy local needs. Policy S1 should not allocated Site S1 for development as it is inappropriate and has not been justified. Land off Court Drive is a more suitable site</p>   |
| LPA 148 | Andrew Tyzzer   | Policy S1: Shenstone Housing Allocations | No  | No  | No | Yes | No  | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</p>  |
| LPA 149 | Lisa Farrington   | 9  |     |     |    |     |     | <p>Objects to developing the Green Belt in Burntwood due to concerns about merging urban areas and the loss of agricultural land and wildlife habitats. Is also concerned about the increase in traffic and pressure on local schools and doctors surgeries</p>  |
| LPA 150 | Joanne Tyzzer   | Policy S1: Shenstone Housing Allocations | No  | No  | No | Yes | No  | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concerns relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</p> |



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| LPA 151 | James Gibson       | Local Plan Allocations Document          | No | No | No |   | No  | <p>It doesn't seem plausible that Local Plan Allocations document which includes the contentious Arkall Farm scheme complies with Duty to Co-Operate.</p> <p>The Local Plan Allocations document is silent over the consent for 750 homes granted by Curborough Craft Centre. The NPPF protects Green Belt and ignoring the consent undermines the case for using Green Belt land.</p>  |
| LPA 152 | Louise Fairweather | 12.14 - 12.16 Policy S1, S2 & S3         | No | No | No | <p>Site S2 should be deleted</p> <p>Site S3 should be deleted</p> <p>Consider releasing more land for housing adjacent to the NP agreed 2.1 ha of land at Shenstone Business Park (Site S1)</p> |     | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concerns relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p><u>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</u></p> |
| LPA 153 | Cynthia Gravestock | Policy S1: Shenstone Housing Allocations | No | No | No | Yes   | No  | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p><u>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</u></p>  |
| LPA 154 | Julia Spencer      | Local Plan Allocations Document          |    |    | No | Yes   | Yes | <p>Concerns over site W1: Land at Huddlesford Lane, citing traffic issues due to the rural nature of the lane alongside current congestion and parking issues. Development on the site would have a detrimental effect on the Conservation Area and Whittington's historical and rural character. Suggests Site W6 as an alternative due to better access and development would be more contiguous with existing dwellings along Back Lane.</p>   |
| LPA 155 | Linda Ashwood      | 9.9                                      |    |    |    |   |     | <p>Supports the proposed development of plans submitted by Burntwood Action Group for Burntwood Town Centre. A shopping centre away from the main road would help cohesion and safety. Businesses would bring economic benefits if Burntwood could have walking access from Town Centre to Chase Water.</p>   |

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| LPA 156 | Mary Pole   | 12.14 - 12.16<br>Policy S1, S2<br>& S3  | No | No | No | Yes |    | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</p> |
| LPA 157 | James Lerner  | Site S2<br>(Shenstone)  | No | No | No | Yes | No | <p>The council's objective assessment of site S2 is undermined by the council previously accepting the 2015 draft Shenstone Neighbourhood Plan because professional sustainability evaluation demonstrated that proposed site S2 was not suitable for new house building. The Local Allocations Plan document has not considered releasing more land for new housing adjacent to the existing resident endorsed and Neighbourhood Plan agreed/approved 2.1 hectares of land at Shenstone Business Park. 80% of the residents of Shenstone in the Neighbourhood Plan Submission of Evidence were supportive of the use of the Business Park for new housing in 2014.</p>   |
| LPA 158 | James Lerner  | Site S3<br>(Shenstone)  | No | No | No | Yes | No | <p>Objects to the development at site S3 due to LDC previously accepting that the site was not suitable for new house building as part of Shenstone's Neighbourhood Plan. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014. LDC have failed in DtC duties as the have not ensured evidence is locally derived and failed to consider an approved Neighbourhood Plan</p>  |
| LPA 159 | Will Brearley (CT<br>Planning) on behalf<br>of Mr D. Burton | Lichfield<br>District Local<br>Plan<br>Allocations<br>(Policies<br>Maps, Inset<br>19) |    |    |    |     |    | <p>Supports the amended settlement boundary in the vicinity of Tufton Cottage, Roman Road, Little Aston. This is a logical change that brings Tufton Cottage within the settlement boundary and, thus, outside of Green Belt and is supported within the 'made; Neighbourhood Plan for Little Aston.</p>  |

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| LPA 160 | David Thompson on behalf of Shenstone Parish Council                | Policy S1: Shenstone Housing Allocations | No | No  | No  | Yes | Yes | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p><del>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</del></p> |
| LPA 161 | Richard Shaw (Savills) on behalf of Barwood Strategic Land II       | 10                                       | No | Yes | Yes | Yes | Yes | <p>The inclusion of Site NT1 is welcomed. However, NT1 is not effective in terms of further meeting the housing requirement of the adjacent authority. The site has the potential to accommodate additional housing, by reconfiguring the masterplan and increasing density in parts of the site. The development of the site can further assist with meeting Tamworth's housing needs under the Duty to Cooperate. The 'key development considerations' in this policy could, however, reflect the planning issues identified and addressed to the satisfaction of the Council as part of the outline planning application process, particularly addressing infrastructure considerations. This policy could also refer to the fact that the Council has resolved to grant outline planning permission for the development of this site at its meeting on 27 February 2017 (application 14/00516/OUTMEI). The Infrastructure Delivery Plan notes (Para 5.45) the need for the infrastructure requirements to deliver development in the North of Tamworth BDL and that 'Details will be developed further through the Local Plan Allocations document and the IDP will be updated accordingly'.</p>   |
| LPA 162 | Stephen Stoney (Wardell Armstrong) on behalf of The Leavesley Group | 12.1                                     |    |     | No  | Yes | Yes | <p>This representation refers 2016 SHLAA site ref. ID:436 Hay End Lane for which a planning application is currently being prepared. The site comprises sustainable development in a sustainable location, where the Paragraph 197 presumption in the NPPF should prevail. For the Local Planning Authority to justify its primary SDA in order to deliver at least 21% of the Plan housing target, and then to state that 'there are sufficient sites to meet the requirements of the Local Plan Strategy' (Para 12.2) and to thereafter propose to tightly draw a Village settlement boundary (Para 12.3 and Inset 12).</p> <p>This approach is unjustified and unsound in that it conflicts with the NPPF principles as set out in Paras 14 and 15 of the NPPF, and Para 151 which firmly sets the principle that Plan making should take a positive approach to achievement of sustainable development. One cannot make a case that development in the SDL area is unsustainable. History reflects that the site was in agricultural use, but this is no longer the case and it is available for development forthwith. The directly adjacent site being promoted has exactly the same sustainable credentials. It is therefore unsound to draw such a restricted boundary to restrict development within the SDA, particularly the opportunity of integration already accepted by the council.</p> <p>On the matter of the former Rugeley Power Station, the proposal of allocation of a minimum of 800 homes. Such long-term projection of development that is yet unproven as developable, deliverable and viable is unjustified in a NPPF Paragraph 173 context. This site has not been formally decommissioned, is stated to be preferred for power re-use or employment generation in order to maximise service supplies.</p>  |
| LPA 163 | Jessica Blocksidge  | Site S3 (Shenstone)                      | No | No  | No  | Yes | No  | <p>Objects to the development at site S3 due to LDC previously accepting that the site was not suitable for new house building as part of Shenstone's Neighbourhood Plan. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014. LDC have failed in DtC duties as the have not ensured evidence is locally derived and failed to consider an approved Neighbourhood Plan</p>   |
| LPA 164 | Mathieu Evans   | Local Plan Allocations                   |    |     | No  | Yes | Yes | <p>Concerned about the growing and unmet housing need emanating from Birmingham. Gladman are concerned therefore that the Council is not more actively seeking to review its Local Plan, we would consider that such a review should take priority for the Council. There is significant danger that the Local Plan could become out of date, and create problems in the wider housing market area as significant housing needs go unmet. Gladman do not consider that as written policy BE2 is in conformity with the NPPF, as such it is considered unsound. This is supported in paragraph 134 of the NPPF which states:- "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use." We would therefore suggest that the first paragraph of policy BE2 is changed to reflect the wording of paragraph 134 of the NPPF.</p>  |

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| LPA 165 | Jessica Blocksidge                                     | Site S2 (Shenstone)                      | No | No | No | Yes | No  | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan that a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building  |
| LPA 166 | Victoris Dawson  | Site S2 (Shenstone)                      | No | No | No | Yes | Yes | LDC has failed to discharge the Duty to Cooperate as it has not collected locally derived evidence, considered in the SA the Shenstone NP in regards to sustainability assessment of site S2 or has not specifically consulted with the Parish Council/ relevant resident groups associated with the "made" Neighbourhood Plan. The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that site S2 was not suitable for new house building as part of the 2015 draft Shenstone NP, a 2016 Independent Planning Inspectors Report, and the passing of the Shenstone NP through cabinet in December 2016. The application for planning permission applied for by CT Planning the South Staffordshire Waterworks in Planning document CET/3511 On 6th October 2016LA was not considered in the Local plan.<br>Main objection is that Site S2 is housing development on Green Belt and LPA has not shown exceptional circumstances as required in the NPPF. The development would be classed as high density, which is out of character with local area. Local school is already oversubscribed. Increase in traffic and accessibility to the site is also a concern. The document does not mention the net gain of 20 houses from the redevelopment of Anson Rd by Bromford Housing Association. Although no planning application has been submitted for this, plans are sufficiently progressed for this to be taken into account. Taken together these additions would add 31 houses to the existing allocation, exceeding the housing requirement for the village. The area being considered for open space is therefore not required for future housing development. There would also be a stronger case for refusal of permission on any additional significant development proposals.  |
| LPA 167 | Helen Fisher on behalf of Burntwood Conservative Group | Local Plan Allocations                   |    |    | No |     |     | Opposes housing being built on the green belt. Concerned what will happen to Burntwood if more large scale development is allowed to take place before infrastructure is improved.<br><br>Development at Highfields Road would leave no distinct division between Staffordshire and West Midlands.<br><br>Lacking infrastructure & facilities to support families living in Burntwood - local schools are already full, sewerage and drainage issues, lack of public transport and poor road conditions which need to be looked at before Burntwood takes more housing.<br><br>Concerns over the impact more houses will have on the local road network.<br><br>Not enough has been done to bring Mount Road forward.<br><br>Supports BAG vision for a Better not Bigger Burntwood.   |
| LPA 168 | Andrew Skidmore  | Policy S1: Shenstone Housing Allocations | No | No | No | Yes | No  | Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.<br><br>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.<br><br>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).<br><br>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period. Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.<br><br>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.<br><br>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.<br><br>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 & S3 being rejected for building |

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| LPA 169 | Phillip Metcalfe (The National Forest Company) | NR11  | Yes | Yes | Yes | Yes | No | The proposed policy address the expectation within The National Forest that new development contributes towards the creation of the Forest. The policy approach that has been adopted elsewhere across the Forest has been adapted here to take into account the District Council's adopted approach to biodiversity offsetting. The resulting policy expects new developments to contribute the same amount of Forest creation expected elsewhere across The National Forest, however, in this Policy, the calculation is in terms of biodiversity units rather than area. This makes the policy more locally relevant and follows the approach to ensuring a biodiversity net gain promoted within the adopted Local Plan and the NPPF. The National Forest Company request that a link is provided to our Guide for Developers and Planners (as referred to in paragraph 6.12) within the Our Local Evidence box.<br><a href="http://www.nationalforest.org/woodlands/woodlandcreation/development/">http://www.nationalforest.org/woodlands/woodlandcreation/development/</a>   |
| LPA 170 | Louise Ann Skidmore                            | Policy S1: Shenstone Housing Allocations    | No  | No  | No  | Yes | No | <p>Lichfield District Council has failed to discharge the DiC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</p> |
| LPA 171 | Peter Wray                                     | Policy A1: Alrewas Housing Land Allocations |     |     |     | Yes |    | The LPA was compiled before the result of the appeal on land north of Dark Lane was published and the boundary of the housing site should be amended to reflect this. The boundary of the site map implies all vehicular access and egress will be via Dark Lane into Park Road. The Lioncourt Planning application included an access road from near the start of Micklehome Drive for incoming traffic from the A38 slip road. The boundary of the allocation area should be amended to reflect this. The boundary of the site shown in the LPA seems to go right up to the edge of Flood Zone 2. Part of this area will be required for Flood Compensation measures and will not be available for dwellings. The Parish Council are building a case for the western end of the land north of Dark Lane to form part of a Green Space for the village. The current application shows this as open space but there is no guarantee that this would not be built on at a later stage. The Green Space would ideally extend from the canal locks along the Trent to the A38. For this reason, the village would wish the western boundary of the Land North of Dark Lane Allocation to be pulled back to the edge of the Conservation Area, while this proposal is developed. The consultation document allocates 110 dwellings to the land north of Dark lane, whereas the application and the appeal decision were for 121 houses, an addition of 11 houses. The document does not mention the net gain of 20 houses from the redevelopment of Anson Rd by Bromford Housing Association. This involves the replacement of 20 Smiths houses with a total of 40 new houses. Although no planning app has been submitted for this, plans are sufficiently progressed for this to be taken into account. Taken together these additions would add 31 houses to the existing allocation, exceeding the housing requirement for the village. The area being considered for open space is therefore not required for future housing development.  |
| LPA 172 | Gareth Blocksidge                              | Site S2 (Shenstone)                         | No  | No  | No  | Yes | No | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building   |
| LPA 173 | Gareth Blocksidge                              | Site S3 (Shenstone)                         | No  | No  | No  | Yes | No | Objects to the development at site S3 due to LDC previously accepting that the site was not suitable for new house building as part of Shenstone's Neighbourhood Plan. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014. LDC have failed in DiC duties as the have not ensured evidence is locally derived and failed to consider an approved Neighbourhood Plan   |

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| LPA 174 | Alice Fitton (Turley) on behalf of Alex Waterworth (Legal and General Property Fund) | EMP1  |    |    | No | Yes | Yes | <p>Broadly supports policy EMP1 but thinks that it's negatively worded, indicating that the starting point for a planning application for any non-traditional complementary use class is refusal unless it can be demonstrated otherwise. L&amp;G propose modifying policy EMP1 to be more positively worded.</p> <p>The modification would mean the starting point for planning applications for complementary uses, which can be demonstrated benefit Fradley Park, will be accepted. The policy would then not represent an over-burdened requirement on business as required by NPPF paragraph 21. Emerging Policy ST5 needs to go further than just protecting the land around Hilliard's Cross junction and commit both Staffordshire County Council and Highways England to exploring a single solution for future proofing to ensure it provides sufficient capacity to accommodate further employment development at Fradley Park.</p>  |
| LPA 175 | Michael Taylor   | Policy S1: Shenstone Housing Allocations      | No | No | No | Yes | No  | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3. Raises several concerns regarding the viability of Site S2 in terms of access and proposed housing.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</p>  |
| LPA 176 | Heather Price  | 12.14   |    |    | No | No  |     | <p>Objects strongly to building in the green belt as it is there to prevent urban sprawl, provide wildlife habitats, prevent flooding and absorb carbon dioxide from the atmosphere. Why can't LDC use brownfield sites for development, as stated in the Shenstone Neighbourhood Plan?</p>  |
| LPA 177 | deleted rep  |   |    |    |    |     |     |  |
| LPA 178 | Julie Haywood  | Policy S1: Shenstone Housing Land Allocations | No | No | No | Yes | No  | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concerns relating to lack of evidence regarding viability for Sites S2 and S3. Raises several concerns regarding the viability of Site S2 in terms of access and proposed housing.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</p> |

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| LPA 179 | Susan Craven Jones | Policy S1:<br>Shenstone<br>Housing Land<br>Allocations | No | No | No | Yes | No | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concerns relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</p> |
| LPA 180 | Sarah Williams     | Policy S1:<br>Shenstone<br>Housing Land<br>Allocations | No | No | No | Yes | No | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</p>  |

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| LPA 181 | Marina Dufaye | Policy S1:<br>Shenstone<br>Housing Land<br>Allocations | No | No | No | Yes | No | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</p> |
| LPA 182 | Tamiko Jones  | Policy S1:<br>Shenstone<br>Housing Land<br>Allocations | No | No | No | Yes | No | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</p> |



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| LPA 183 | Andre Dufaye | Policy S1:<br>Shenstone<br>Housing Land<br>Allocations | No | No | No | Yes | No | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</p> |
| LPA 184 | Alex Capper  | Policy S1:<br>Shenstone<br>Housing Land<br>Allocations | No | No | No | Yes | No | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</p> |

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| LPA 185 | David Thompson<br>(Shenstone Parish Council)                          | Policy S1:<br>Shenstone<br>Housing Land<br>Allocations | No | No  | No  | Yes | No | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</p> |
| LPA 186 | Andrew Baker  | Policy S1:<br>Shenstone<br>Housing Land<br>Allocations | No | No  | No  | Yes | No | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</p> |
| LPA 187 | Luke Walker -<br>Lichfield & Hatherton<br>Canals Restoration<br>Trust | 2.2  | No | Yes | Yes | Yes | No | <p>Lichfield District Council has a Duty to Co-operate with Cannock Chase District Council on cross-boundary matters. We feel there is some confusion in the LPA document as the Lichfield Canal does not cross the boundary with Cannock Chase District. We propose that paragraph 2.2 be amended to read</p> <p>'The route positively contributes to a restored Lichfield Canal and the associated Heritage Towpath Trail. The positive contribution is established within the Local Plan Strategy. Its connection to the wider canal network is subject to a detailed water study demonstrating an adequate water supply can be provided to support its use and the existing network. The assessment will also need to demonstrate that there will be no significant impact on the functions of the ecology of the wider canal network.'</p>   |
| LPA 188 | deleted rep   |  |    |     |     |     |    |   |

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| LPA 189 | Adrian Scattergood  | Local Plan Allocations |    |    | No | Yes |     | Believes that the LPA has been produced against inadequate and unfair evidence, particularly with regard to the Green Belt Reviews carried out in 2012, 2013 and 2016 and the Urban Capacity Assessment 2016. States all these documents and the LPA is unsound and wants a full review of Lichfield District Council's Local Plan Allocations document, with the full removal of Green Belt development from the plan. States there is enough evidence to support alternative development on available Brownfield sites, but only once Burntwood has achieved greater sustainability. Green Belt and unaltered Green Belt boundaries require full and permanent protection. Has also stated that the Sustainability Appraisal is unsound (summarised in separate SA spreadsheet)   |
| LPA 190 | Debbie Scattergood  | Local Plan Allocations |    |    | No | Yes |     | Believes that the LPA has been produced against inadequate and unfair evidence, particularly with regard to the Green Belt Reviews carried out in 2012, 2013 and 2016 and the Urban Capacity Assessment 2016. States all these documents and the LPA is unsound and wants a full review of Lichfield District Council's Local Plan Allocations document, with the full removal of Green Belt development from the plan. States there is enough evidence to support alternative development on available Brownfield sites, but only once Burntwood has achieved greater sustainability. Green Belt and unaltered Green Belt boundaries require full and permanent protection. Has also stated that the Sustainability Appraisal is unsound (summarised in separate SA spreadsheet)   |
| LPA 191 | Janet Hodson (JVH Planning) on behalf of Shipley Estates/Baxter Estates | 4.6                    | No |    | No | Yes |     | In principal we support the allocation of Site FZ1. We object to the development considerations set out under FZ1 which are of concern. It is not clear what is envisaged by the note regarding the edge of vilage location in design terms and an urban to rural transition. The site adjoins the existing development south of Lichfield Street and similar frontage is found south of the Mile Oak Crossroads, fronting the A453. The development on the corner of these roads is currently 3 storeys. It is not clear what other considerations should apply to the design and layout. It is not clear how the development should deal with the criterion related to landscape character and crop marks. If this is a matter of recording the crop marks prior to development then the Plan should say so.  |
| LPA 192 | Mr P T Bassett  | 9                      |    |    |    | No  |     | Objects to plans to remove green belt land surrounding Burntwood and believes there are fundamental problems with the Supplement to the Green Belt Review 2014 document. Fully supports Burntwood Action Group's submission regarding sites B14 and B15. Asks whether planners have fully considered the use of old and dilapidated industrial sites for housing developments? Is also concerned about the increased housing exacerbating the traffic problems in Burntwood.  |
| LPA 193 | Lynette Wadlow-Smith  | 12.14                  | No | No | No | Yes | No  | Lichfield District Council has failed to discharge the DTC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.<br><br>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.<br><br>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1). Questions why other villages such as Stonnall or Little Aston could not absorb some of these numbers.<br><br>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.<br><br>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.<br><br>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support |
| LPA 194 | deleted rep   |                        |    |    |    |     |     |   |
| LPA 195 | Janet Hodson (JVH Planning) on behalf of Walton Homes                   | 4.6                    | No |    | No | Yes | Yes | There should be a review of the 2015 Strategy to take into account the further development that will be required to meet Birmingham's housing shortfall. It is more appropriate to consider the settlement boundary and green belt alterations once the Birmingham requirement is known and reduce the need to undertake two plans. The buffer of 11% flexibility allowance is not considered appropriate and should be increased to 20%. The Plan should allocate additional smaller sites to ensure a deliverable supply. The plan as drafted does not provide for a robust 5 year supply. Objection is made to the omission of Brick Kiln Farm site (SHLAA 92) from Policy AH1. The site forms a natural extension to the settlement and is surrounded by development on three sides, therefore not extending the built up area out into the open countryside. Only 200 dwellings are allocated to Armitage with Handsacre which does not reflect the level of service and facility available in the settlement. The plan should make provision for additional land.   |
| LPA 196 | Janet Hodson (JVH Planning) on behalf of Mr B Gough                     | 4.6                    | No |    | No | Yes | Yes | There should be a review of the 2015 Strategy to take into account the further development that will be required to meet Birmingham's housing shortfall. It is more appropriate to consider the settlement boundary and green belt alterations once the Birmingham requirement is known and reduce the need to undertake two plans. The buffer of 11% flexibility allowance is not considered appropriate and should be increased to 20%. The Plan should allocate additional smaller sites to ensure a deliverable supply. The plan as drafted does not provide for a robust 5 year supply. We object to the development boundary at Hill Ridware on the basis that the land at Ridware House should be included within the settlement boundary. The area is contained by residential development and the inclusion of this area would allow for the construction of two dwellings as infill development. The development boundary is being changed to include HR1, this change means that it is logical to bring the western boundary of the settlement up to Wade Lane and include the subject land within the defined area of the settlement.   |

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| LPA 197 | Richard Wadlow-Smith  | 12.14     | No | No | No | Yes | No  | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1). Questions why other villages such as Stonnall or Little Aston could not absorb some of these numbers.</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> |
| LPA 198 | Janet Hodson (JVH Planning) on behalf of Mr Bliss/Messrs Argyll | 4.6       | No |    | No | Yes | Yes | <p>There should be a review of the 2015 Strategy to take into account the further development that will be required to meet Birmingham's housing shortfall. It is more appropriate to consider the settlement boundary and green belt alterations once the Birmingham requirement is known and reduce the need to undertake two plans. The buffer of 11% flexibility allowance is not considered appropriate and should be increased to 20%. The Plan should allocate additional smaller sites to ensure a deliverable supply. The plan as drafted does not provide for a robust 5 year supply. Objection is made to OR1 on the grounds that the policy makes no provision in Hopwas for new housing development and omits SHLAA site 1033 Land at Plantation Lane Hopwas. A viable and sustainable mixed development can be achieved on the site which includes a linear open space to link through to Nursery Lane. The green belt boundary would need to be relocated to the south and would enable a softer boundary to the settlement which would be an improvement over the existing hard built edge.</p>   |
| LPA 199 | Janet Hodson (JVH Planning) on behalf of Mr & Mrs Hodgetts      | 4.6       | No |    | No | Yes | Yes | <p>There should be a review of the 2015 Strategy to take into account the further development that will be required to meet Birmingham's housing shortfall. It is more appropriate to consider the settlement boundary and green belt alterations once the Birmingham requirement is known and reduce the need to undertake two plans. The buffer of 11% flexibility allowance is not considered appropriate and should be increased to 20%. The Plan should allocate additional smaller sites to ensure a deliverable supply. The plan as drafted does not provide for a robust 5 year supply. Objection is made to Policy OR1 on the grounds that the policy makes no provision in Elford for new housing development and omits SHLAA site 86. The plan should increase the land allocations for the rural area and include the subject land as a suitable site for residential development to meet part of the housing needs of the rural areas. Elford can accommodate a modest amount of development to support the future of the settlement.</p>  |
| LPA 200 | Joan Miles  | Policy S1 |    |    |    |     |     | <p>Objects to proposed housing development on Court Drive, Shenstone as this land is green belt and should stay green belt. The village does not have the infrastrucure to support this development e.g extra school places, extra places at the doctor surgery and the traffic problems this will cause in the village.</p>  |
| LPA 201 | Janet Hodson (JVH Planning) on behalf of Mr M Neachell          | 4.6       | No |    | No | Yes | Yes | <p>There should be a review of the 2015 Strategy to take into account the further development that will be required to meet Birmingham's housing shortfall. It is more appropriate to consider the settlement boundary and green belt alterations once the Birmingham requirement is known and reduce the need to undertake two plans. The buffer of 11% flexibility allowance is not considered appropriate and should be increased to 20%. The Plan should allocate additional smaller sites to ensure a deliverable supply. The plan as drafted does not provide for a robust 5 year supply. The proposal to allocated 209 dwellings in Fazeley is insufficient for its scale and size. SHLAA site 95, occupying the area north of Lichfield Road and West of the The Green should be excluded from the green belt and allocated for development in this plan or safeguarded land for development in a a Plan Review. The 2016 SHLAA notes that the site lies within the Conservation Area but this is not the case and the SHLAA is in error. SHLAA site 94, north of the Green and east of Plantation Lane, could be developed and deliver around 100 dwellings. This site should be excluded from the Green Belt and allocated.</p>   |
| LPA 202 | Janet Hodson (JVH Planning) on behalf of Mrs M Wiseman          | 4.6       | No |    | No | Yes | Yes | <p>There should be a review of the 2015 Strategy to take into account the further development that will be required to meet Birmingham's housing shortfall. It is more appropriate to consider the settlement boundary and green belt alterations once the Birmingham requirement is known and reduce the need to undertake two plans. The buffer of 11% flexibility allowance is not considered appropriate and should be increased to 20%. The Plan should allocate additional smaller sites to ensure a deliverable supply. The plan as drafted does not provide for a robust 5 year supply. Objection is made to the omission of the Court Drive site (SHLAA site 684) from Policy S1. The site forms a natural extension to the settlement and is well contained by the A5127. Only 140 dwellings are allocated to Shenstone, which does not reflect the level of service and facility available in the settlement.</p>  |

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| LPA 203 | Angela Anderson   | Policy S1:<br>Shenstone<br>Housing Land<br>Allocations | No  | No  | No | Yes | No  | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</p> |
| LPA 204 | Janet Hodson (JVH Planning) on behalf of Mr Bhagi                     | 4.6  | No  |     | No | Yes | Yes | <p>There should be a review of the 2015 Strategy to take into account the further development that will be required to meet Birmingham's housing shortfall. It is more appropriate to consider the settlement boundary and green belt alterations once the Birmingham requirement is known and reduce the need to undertake two plans. The buffer of 11% flexibility allowance is not considered appropriate and should be increased to 20%. The Plan should allocate additional smaller sites to ensure a deliverable supply. The plan as drafted does not provide for a robust 5 year supply. Objection is made to the omission of SHLAA site 380, Land South of the Golf Course, Little Aston. The site forms a natural extension to the settlement and is well contained by the railway line to the south, residential development to the east and woodland to the west.</p>  |
| LPA 205 | Janet Hodson (JVH Planning) on behalf of Mrs E Sketchley              | EMP1   | No  |     | No | Yes | Yes | <p>Objection is made to policy EMP1 on the basis that there is no employment allocation made within the area of Fazeley, Mile Oak and Bonehill. Land west of Sutton Road Mile Oak is considered to be an appropriate site for the expansion of the existing commercial uses or additional complimentary commercial uses. This area is very well contained by the A5, the A453 and existing commercial uses. The site has excellent linkages to the A5. The existing allocations in Fazeley are simply the existing employment areas and there is no allowance for future employment development. Policy EMP1 is not clear. The policy sets out that an additional 10 ha of employment land is to be allocated, yet the sites in the table are substantially more than 10 ha. The plan sets out that there is flexibility to provide 6.5 ha of employment land that cannot be found within Tamworth. It is not clear where this land is identified in this Plan and needs to be clarified</p>  |
| LPA 206 | RNP Roberts   |  |     |     |    |     |     | <p>Attached copy of SHLAA plan identifying Land at the rear of 18 Mill End lane Alrewas (Reference Numbers 439 and 550) shown as 'not currently developable' on the plan, after a submission has been made for 10 houses.</p> <p>Neighbourhood Plan contains a matrix that indicates a low massing scheme of 5 units would be acceptable. Part of the site was removed from SHLAA because permission had been given on part by April 2010.</p> <p>LPA excludes the site as it appears to be derived from the SHLAA when permission has been given on part of 550 for two dwellings The indication in the NP pre-submission consultation was the wording should be amended to ensure development was appropriate in design and scale. The Matrix included in the NP scored the site as developable.. Site 439 should be included in the LPA document for 8 further or an amendment be made to the introduction as follows 'to identify land allocations of five units or more associated with meeting with growth requirements'...</p>   |
| LPA 207 | Nick Misselke (Acquireland) on behalf of Philip Carter (Edenwood Ltd) | LC1  | Yes | Yes | No | Yes | Yes | <p>LPA does not meet local needs for housing. None of the allocations are specifically for self build and custom houses. The LPA should consider allocating land at Fossey Lane for housing and specifically housing that is either self build or custom houses. Promotes land at Fossey as capable of accommodating up to 15 dwellings.</p> <p>LPA is not justified insofar as no specific provision is made for self build and custom homes. Not clear from the SA or LPA why the LPA has chosen not to identify potential self build and custom house sites.</p> <p>LPA should provide for a range of housing in terms of its type and design including self build and custom housing. Promotes site (SHLAA reference 633) for release from the Green Belt and confirms there are no known constraints that prevent the site from being developed.</p>   |

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| LPA 208 | Mr Steven Keyte      | Policy S3:<br>Shenstone<br>Housing<br>Allocations      | No | No | No | Yes | No  | Objects to the development at site S3 due to LDC previously accepting that the site was not suitable for new house building as part of Shenstone's Neighbourhood Plan. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014. LDC have failed in DTC duties as the have not ensured evidence is locally derived and failed to consider an approved Neighbourhood Plan  |
| LPA 209 | Mr Ben Smith         | 12.14  | No | No | No | Yes | No  | Disapproves of the way the consultation has been hidden from the public. Sites S2 and S3 are not sustainable development sites. Questions why S1 has been allocated when it is already allocated by Shenstone Neighbourhood Plan. LDC never clearly advised that, if the Shenstone Neighbourhood Plan did not allocate or recommend sites in the green belt for release to, as a minimum, meet the higher end of the Policy Shen4 requirement of 150 dwellings, then LDC would allocate sites itself. Only one engagement event was held in Shenstone between 3:30pm and 6:30pm when many people were unavailable due to work and family commitments. Objects to building on the pumping station and Lammas land as it will ruin the aesthetic. Mr Smith states he is a Scout Leader and regularly uses the Lammas field for scouting activities..   |
| LPA 210 | Mr Keith Goldsworthy | 12.14  | No | No | No | Yes | No  | Lichfield District Council has failed to discharge the DTC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.<br><br>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.<br><br>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1). Questions why other villages such as Stonnall or Little Aston could not absorb some of these numbers.<br><br>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.<br><br>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.<br><br>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan. |
| LPA 211 | Donja Martin         | 12.14  |    |    | No | No  |     | Believes that the LPA is unsound and objects to removing land from the Green Belt. The Plans want to use the land adjacent to ancient woodland and to the Lammas land to build houses. This land was meant to be used by the residents of Shenstone for enjoyment. The impact of the noise from the Toll Road and the increased traffic around our village means that we value these green spaces even more. Green space is vital to the well-being of the residents of Shenstone and should be cherished. It is also suggested that priority species inhabit these areas. Insufficient effort has been put into bringing forward old and dilapidated industrial sites for housing development. The brownfield site on Birchbrook Industrial Site has many options   |
| LPA 212 | Richard Smith        | 12.14  | No | No | No | Yes | Yes | The Lichfield District Local Plan Allocation for Shenstone has completely ignored the Shenstone Neighbourhood Plan that so many people took time out of their busy lives to bring together for the good of the wider community. The additional S2 and S3 sites were considered but discarded as development of them would spoil Shenstone. By withdrawing greenbelt status and allowing development on sites S2 & S3 would not in any way help solve the issues we face of high and increasing traffic volumes through the narrow village streets (Pinfold Hill) including the Heavy Goods articulated Vehicle menace. The LDC planners, by suggesting S2 & S3 have shirked their responsibility and have completely ignored the well publicised issues of HGV's and Shenstone Railway Station's parking issues. The Local Allocations Plan document has not considered releasing more land for new housing adjacent to the existing, resident endorsed and Neighbourhood Plan agreed and approved 2.1 hectares of land at Shenstone Business Park (S1), Lynn Lane, Shenstone. Approximately 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014.  |
| LPA 213 | Heather Price        | Policy S1:<br>Shenstone<br>Housing Land<br>Allocations |    |    | no | Yes |     | Without strong protection for our Green Belt the countryside will be lost. For example, the city of Los Angeles sprawls more than 50 miles eastwards from its centre. I do not want that in the UK.<br><br>Housing needs can be met while sustaining our Green Belts for future generations by using brownfield land. Protecting the Green Belt encourages the revitalisation of these sites.<br><br>Why can't LDC use brownfield sites for its development as stated in the Shenstone Neighbourhood Plan?<br><br>LDC must ensure the countryside is protected for now and future generations.   |

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| LPA 214 | Alex Smith  | Policy S1:<br>Shenstone<br>Housing Land<br>Allocations | No | No | No | Yes | No | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</p> |
| LPA 215 | Tim Johnson | Policy S1:<br>Shenstone<br>Housing Land<br>Allocations | No | No | No | Yes | No | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</p> |

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|---------|--------------|--|----|----|----|-----|----|---|
| LPA 216 | David Hooson | Policy S1:<br>Shenstone<br>Housing Land<br>Allocations | No | No | No | Yes | No | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</p> |
| LPA 217 | Lisa Ergun   | Policy S1:<br>Shenstone<br>Housing Land<br>Allocations | No | No | No | Yes | No | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</p> |



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| LPA 218 | Elizabeth Strachan | Policy S1:<br>Shenstone<br>Housing Land<br>Allocations | No | No | No | Yes | Yes | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</p> |
| LPA 219 | Ian Price          | Policy S1  |    |    |    | no  |     | <p>Dismayed at Green belt allocations which fly in the face of the NP agreed between Parish and LDC</p>   |
| LPA 220 | Stuart Brennan     | Policy S1:<br>Shenstone<br>Housing Land<br>Allocations | No | No | No | Yes | No  | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</p> |

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| LPA 221 | Helen Brennan | Policy S1:<br>Shenstone<br>Housing Land<br>Allocations | No | No | No | Yes | No  | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p><u>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</u></p> |
| LPA 222 | Joanne Smith  | 12.14  | No | No | No | Yes | Yes | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1). Questions why other villages such as Stonnall or Little Aston could not absorb some of these numbers.</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p>  |

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| LPA 223 | Ian Strachan                    | Policy S1:<br>Shenstone<br>Housing Land<br>Allocations | No | No | No | Yes | Yes | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</p> |
| LPA 224 | Network Rail (Mrs Diane Clarke) | Local Plan<br>Allocations                              |    |    |    |     |     | <p>This representation includes a number of generic matters some of which relate more to planning applications. The consultee did not respond as per the structured questions. The full technical advice regarding the LPA is too lengthy for this can be found in the full representation. As such this summary only includes those points which relate directly to the LPA: Within the Local Plan Allocations document there are sites that are adjacent to the existing railway infrastructure. Development considerations include noise mitigation due to the adjacent railway boundary. The LPA and the developer (along with their chosen acoustic contractor) are recommended to engage in discussions to determine the most appropriate measures to mitigate noise and vibration from the existing operational railway to ensure that there will be no future issues for residents once they take up occupation of the dwellings.</p> <p>The document makes reference to allocated areas in high risk flood zone areas with consideration on flood risk mitigation measures and surface water run off management.</p> <p>The NPPF states that, " 103. When determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere ." We recognise that councils are looking to proposals that are sustainable, however, we would remind the council in regards to this proposal in relation to the flooding, drainage, surface and foul water management risk that it should not increase the risk of flooding, water saturation, pollution and drainage issues ' elsewhere ', i.e. on to Network Rail land.</p> <p>Development proposals should therefore include consideration of surface water/flooding risk in relation to the existing operational railway land and infrastructure.</p>   |

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| LPA 225 | Fiona Willimott | Policy S1:<br>Shenstone<br>Housing Land<br>Allocations | No | No | No | Yes | Yes | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</p> |
| LPA 226 | Roy Foster      | Policy S1:<br>Shenstone<br>Housing Land<br>Allocations | No | No | No | Yes | Yes | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</p> |

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| LPA 227 | Helen Goldsworthy                                  | Policy S1:<br>Shenstone<br>Housing Land<br>Allocations | No       | No | No | Yes | No  | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</p>                             |
| LPA 228 | John Thompson on behalf of Lichfield Civic Society | Local Plan Allocations                                 | Possibly | No | No | Yes | Yes | <p>Commitment in the approved Local Plan to undertake an early review or partial review if it is evident that the needs of Birmingham City require such action. Considers the progression of the Local Plan Allocations is appropriate at this time.</p> <p>Watery Lane, Curborough decision increases the numbers allocated by 19% higher than the 10,030 requirement in the Local Plan Strategy. Society agree the site at Curborough is not in line with the Planning Strategy and should not become the basis for the location of further housing development as it is too close to the urban edge of the City.</p> <p>The 750 dwellings at Watery Lane should be included in the total numbers of dwellings allocated so it is clear what the current factual situation is. Burntwood although similar size to City is only allocated 13% of the District's housing allocations compared with the City at 36. Consideration should be given to additional housing allocations within Burntwood Town Centre.</p> <p>Site L2: East of Lichfield (Streethay) SDA extension seems unnecessary in the view of the excess provision already existing and should be removed<br/>Site B14: Land South of Highfields Road should be reduced.</p> <p>Insufficient provision is being made to secure infrastructure for development proposals. In relation to Burntwood there is a pressing need to improve social and community facilities and infrastructure including highways. Its not evident that the additional sites or those allocated in the Local Plan will do anything other than exacerbate the deficiency in respect of the provision of essential infrastrucutre.</p> <p>In relation to Lichfield City, concern regarding Policies ST3 Road Line Safeguarding and ST4 Junction Improvements - Lichfield City. The policies are listed for planning protection but their provision should be made a pre-requisite of thr Local Plan housing and employment proposals being implemented.</p> <p>Introduction of significant Green Belt allocations in Burntwood and Hammerwich are inconsistent with Local Plan policies and the NPPF. It is not necessary to meet the numbers required by the plan. Since the Council is exceeding its housing numbers by 11% there is no case of 'very special circumstances' on the grounds of shortage of sites allocated. It is not evidence what the Councils considers 'very special circumstances' that necessitate further release of Green Belt sites.</p> |

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| LPA 229 | David Tomlinson | Policy S1:<br>Shenstone<br>Housing Land<br>Allocations | No | No | No | Yes | No | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>Shenstone has a thriving hedgehog community which could be affected.</p> <p>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</p> |
| LPA 230 | Julie Hession   | Site B14<br>(Burntwood)                                |    |    |    |     |    | <p>Site B14 is essential Green Belt separating Burntwood from the West Midlands and should be preserved. Other Brownfield sites are available and these should be used first before Green Belt. If Greenbelt has to be used there are other sites within Burntwood and the District that are more suitable including a) Land West of Stables Way and bounded by Old Ironstone Road and Severns Road Chase Terrace.</p> <p>b) Land South of the M6 Toll and north of the A5, bounded by the A5, B5195 Ogle Hay Road and B5195 Burntwood Bypass.</p> <p>c) The large site bounded by Rugeley Road, Nether Lane, Coulter Lane and Church Road Burntwood. This is already identified as a long term strategic solution. Suggests that inappropriate industrial sites in residential areas should be re-developed for housing eg. Mount Road and Queens Drive.</p>   |
| LPA 231 | Patrick Martin  | Policy S1:<br>Shenstone<br>Housing Land<br>Allocations | No | No | No | Yes | No | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</p>   |

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| LPA 232 | Diane Lucas    | 12.14 - 12.16<br>Policy S1, S2<br>& S3                 | No | No | No | Yes |    | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</p> |
| LPA 233 | Jayne Fishwick | Policy S1:<br>Shenstone<br>Housing Land<br>Allocations | No | No | No | Yes | No | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</p> |

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| LPA 234 | Charles Anderson  | Policy S1:<br>Shenstone<br>Housing Land<br>Allocations | No  | No | No | Yes | No  | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</p> |
| LPA 235 | Louise Flowith  | Local Plan<br>Allocations<br>Document                  | No  | No | No | Yes | Yes | <p>LDC have failed to consider the strategic priorities of their neighbouring authorities and therefore not fulfilled the requirements of the Localism Act. Gives example of Arkall Farm which Tamworth Council opposes, which has now been called in by the Secretary of State. Local Plan Allocations Document should have been postponed a few months until the broad locations for the Greater Birmingham Housing Market Area shortfall are known given the clear weaknesses in the document. Not positively prepared as the Watery Lane development has not been included in the draft document despite having planning permission for 750 dwellings. Whereas the Dark Lane site was granted planning permission by the Secretary of State on the same date has been included within the Local Plan Allocations. Local Plan Allocations is not consistent with the NPPF in that Green Belt should be protected and boundaries amended only in exceptional circumstances. LDC also ignored February 2017 White Paper. Suggests that the consultation should be started again taking account of issues mentioned.</p>  |
| LPA 236 | Paul Rouse (Savills)<br>on behalf of Rugeley<br>Power Limited | Appendix E   | Yes | No | No | Yes | Yes | <p>Appendix E contains a number of requirements which are unreasonable and in appropriate.</p> <p>Supports E2 that states development should ensure that it makes best use of the land and that E3(1) for a minimum of 800 homes</p> <p>E3(2) enhancement of ecological interests goes beyond NPPF requirements (para 109-117). Where NPPF does seek enhancement of biodiversity it is with regard to specific circumstances set out in para 118</p> <p>E4(2) requires net gain in biodiversity and goes above NPPF requirements. Large areas of site are overlain with PFA which in accordance with Environmental Permits needs to be removed, relocated or stabilised and therefore vegetation and mature trees in PFA will need to be removed.</p> <p>E4(3) seeks to retain existing sports facilities within the site. Sports facilities aren't natural assets and are constructed on PFA therefore may be an environmental requirement that PFA and hence sports facilities are removed.</p> <p>E4(3) preference for retention of Borrow Pit as a water feature is contrary to LPS Policy CP6 and requires a formal review of LPS to change adopted policy.</p> <p>E4(6) Policy R1 can be connected with Borrow Pit component of East of Rugeley SDA as in same ownership, other elements of SDA are constrained by third party ownership and therefore may be difficult to achieve active linkages if landowners unwilling to cooperate.</p> <p>E4(7) land ownership's constrain where second access point can be taken from</p> <p>E4(14) public art may be appropriate but should not be a specific requirement</p> <p>E4(15) allotments are not located within R1 allocation site as currently defined on proposals map</p> <p>No justification for community hub to incorporate sports building, retail provision and new primary school</p>  |



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| LPA 237 | Jim Pole  | Policy S1:<br>Shenstone<br>Housing Land<br>Allocations            | No  | No | No | Yes | No  | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</p> |
| LPA 238 | Paul Rouse (Savills)<br>on behalf of Rugeley<br>Power Limited | Paragraph<br>11.1 - 11.3<br>Policy R1<br>Inset East of<br>Rugeley | Yes | No | No | Yes | Yes | <p>Supports allocation for a minimum of 800 dwellings</p> <p>Para 11.3 refers to Borrow Pit being anticipated to deliver 450 dwellings within the East Rugeley SPD. Appendix E notes the Borrow Pit is to be retained as a landscape water feature – it is not possible for Table 4.1, Policy R1 or Appendix E to change adopted LPS Policy CP6.</p> <p>LPA seeking to impose site specific policy on Borrow Pit which is outline the area to which the site specific policy applies as defined on the Proposals Map</p> <p>Policy R1 allocation boundary should be amended to include Borrow Pit area and balance of Rugeley B Power Station site up to its boundary with A513. This is necessary for access to R1 allocation and to enable efficient use of land around the Borrow Pit in the redevelopment of Rugeley B Power Station.</p> <p>Policy R1 amended to clarify 800 dwellings is in addition to the Borrow Pit contribution to the East of Rugeley SDA.</p> <p>Proposals map amended to include area of Borrow Pit and all of Rugeley B Power Station land within LD administrative area, within the R1 allocation.</p>   |
| LPA 239 | Paul Rouse (Savills)<br>on behalf of Rugeley<br>Power Limited | Table 4.1   | Yes | No | No | Yes | Yes | <p>Table 4.1 identifies residual balance to be delivered in SDAs including East of Rugeley. East of Rugeley is allocated for 1,125 dwellings in LPS. Table 4.1 states 543 dwellings have been completed and residual balance is 79 dwellings – this figure is incorrect and should be 503 dwellings.</p> <p>Attempting to change adopted LPS Policy CP6 through allocations document and this can only be done through a formal review of the LPS - there is a policy conflict between the LPS and LPA</p> <p>Policy R1 and Appendix E attempt to change policy CP1 and CP6 by deleting the contribution of the Borrow area at RPS. Table 4.1 identifies balance from the remainder of SPD as 79 therefore Borrow Pit site should provide 503 dwellings.</p> <p>Proposals Map inset to show the Borrow Pit within East of Rugeley SDA, LPA must be amended to be consistent with itself and the LPS.</p> <p>Allocation for 800 for East of Rugeley should be retained because it relates to Rugeley Power B Station and is separate from the SDA in LSP CP6.</p> <p>LPA should be amended to correctly reflect the balance of housing to still be delivered in East of Rugeley SDA to 582, this comprises of 79 dwellings on land outside of Rugeley B Power Station and 503 dwellings on the Borrow Pit.</p>   |
| LPA 240 | Ken Connor  | Site S2<br>(Shenstone)  | No  | No | No | Yes | No  | <p>The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan that a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was “made” at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building</p>   |

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| LPA 241 | Ken Connor   | Site S3 (Shenstone)                      | No  | No  | No  | Yes | No  | Objects to the development at site S3 due to flooding issues and increased traffic. The existing resident endorsed and Neighbourhood Plan agreed and approved 2.1 hectares of land at Shenstone Business Park, Lynn Lane, Shenstone. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014.   |
| LPA 242 | Pauline Sampson  | Policy S1: Shenstone Housing Allocations | No  | No  | No  | Yes | No  | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</p> |
| LPA 243 | Aidan Hearne   | Policy S1: Shenstone Housing Allocations | No  | No  | No  | Yes | Yes | <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building of new homes. LDC subsequently approved these April 2016 conclusions.</p>   |
| LPA 244 | Christopher Timothy(CT Planning) on behalf of St Johns Hospital Trust        | Site L12 (Lichfield)                     | Yes | Yes | Yes | No  | Yes | Supports the land allocation at St Johns Hospital, Birmingham Road (Site L12) for up to 36 dwellings which assists in meeting the local need for housing. The site is vacant previously developed land which is deliverable for development within the plan period, therefore the site should be developed for specialist housing. Feasible to deliver specialist housing that is compatible with sites location within a Conservation Area. Site is in a sustainable location - 250m from Lichfield City train station, 300m from Lichfield bus station.   |
| LPA 245 | Christopher Timothy (CT Planning) on behalf of South Staffordshire Water Plc | Site L10 (Lichfield)                     | Yes | Yes | Yes | No  | Yes | Supports the allocation of the land off Burton Road (West) Streethay (Site L10) for 38 dwellings. Committed to bringing the site forward for residential development within the next five years. 2016 SHLAA identifies the site to be suitable, available, achievable and deliverable for housing. Well located to provide for a balanced residential development to meet the needs of Lichfield and the surrounding District for housing. Streethay has the benefit of being located outside of the Green Belt and is well served by public transport and in close proximity to a major trunk road. Within 2kms of Streethay can be found a range of doctors, dentists and a hospital, primary and secondary schools, retail services and other social and community facilities.   |

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| LPA 246 | Sandra Brett  | Burntwood                                  |     |     |                               |     |     | Supports Burntwood Action Group submission relating to Supplement to the Green Belt Review 2014, Sustainability Appraisal 2017 and Site B15 Land east of Coulter Lane. Supports Hammerwich Action Group submission relating to Site B14 Land South of Highfields Road.<br><br>Burntwood has been allowed to sprawl across valuable green land and its not time to value all the Green Belt which surrounds it. Green Belt sites on the periphery of Burntwood are not sustainable. Expansion of Burntwood will exacerbate existing congestion out of the area at peak times and LDC must work with local community and their representatives for the release of brownfield sites for housing.  |
| LPA 247 | Christopher Timothy (CT Planning) on behalf of Mr J Duncan                            | Policy W1: Whittington Housing Allocations | Yes | Yes | No (consistent with NPPF)     | Yes | Yes | Objects to the Allocations document as the plan does not fully meet the local need for housing within Whittington. Proposes land to East of Common Lane be allocated for housing development (21 homes). Allocations document is not justified as it has allocated sites that are not considered the best when compared to the alternatives. Site W1 (60 dwellings) is not being actively promoted and can only be delivered by undertaking significant alterations to the highway network. Sites W1 and W3 should be deleted and replaced by the land East of Common Lane and land at Church Farm, Back Lane, Whittington   |
| LPA 248 | Dominic Brett   | Burntwood                                  |     |     |                               |     |     | Supports Burntwood Action Group submission relating to Supplement to the Green Belt Review 2014, Sustainability Appraisal 2017 and Site B15 Land east of Coulter Lane. Supports Hammerwich Action Group submission relating to Site B14 Land South of Highfields Road.<br><br>Burntwood has been allowed to sprawl across valuable green land and its not time to value all the Green Belt which surrounds it. Green Belt sites on the periphery of Burntwood are not sustainable. Expansion of Burntwood will exacerbate existing congestion out of the area at peak times and LDC must work with local community and their representatives for the release of brownfield sites for housing.  |
| LPA 249 | William Brett   | Burntwood                                  |     |     |                               |     |     | Supports Burntwood Action Group submission relating to Supplement to the Green Belt Review 2014, Sustainability Appraisal 2017 and Site B15 Land east of Coulter Lane. Supports Hammerwich Action Group submission relating to Site B14 Land South of Highfields Road.<br><br>Burntwood has been allowed to sprawl across valuable green land and its not time to value all the Green Belt which surrounds it. Green Belt sites on the periphery of Burntwood are not sustainable. Expansion of Burntwood will exacerbate existing congestion out of the area at peak times and LDC must work with local community and their representatives for the release of brownfield sites for housing.  |
| LPA 250 | Ellen Bird on behalf of Hammerwich Parish Council                                     | Burntwood                                  |     |     |                               |     | Yes | Support local opinion that says no to green belt destruction.<br><br>Green Belt Review Assessment assessed land off Highfields Road (Parcel S1) as "important" on three grounds: 1. to check unrestricted sprawl of large built up areas, 2. preventing neighbouring towns from merging 3. maintaining local settlement pattern and hierarchy and the proposal would narrow the gap between Burntwood and Brownhills and the three Important purposes of Green Belt prevent this happening.<br><br>Need to consider alternative uses for the site such as for outdoor sport and recreation. Do not consider strategic housing growth to be exceptional circumstance to justify the release of Green Belt. The third Green Belt review is attempting to overturn the first review for Parcel S1 (Highfields Road) and Parcel E1 (West of Coulter Lane). E1 has only overall moderate score and in accordance with the suggested principles for Green Belt release should be the first to go.<br><br>Policy Burntwood 3: Economy sets out vision for Town Centre and Employment. The existing provision for shopping on Inset 3: Burntwood Plan has developed without strategy to meet the needs of local people. Burntwood cannot be sustainable until it provides a lot more jobs and reduces the need for cars. |
| LPA 251 | Christopher Timothy (CT Planning) on behalf of S Day (Lichfield Care Development Ltd) | Policy LC1                                 | Yes | Yes | No                            | Yes | Yes | LPA does not meet local needs for housing in particular local need for care home bed spaces. LPA document only provides for 62 dwellings of a specialist nature and evidence suggests a considerably greater number of care home spaces need to be provided for.<br><br>Promotes land at Eastern Avenue to be allocated for a care home to deliver up to 71 care beds.   |
| LPA 252 | Christopher Timothy (CT Planning) on behalf of Elford Homes                           | Policy W1: Whittington Housing Allocations | Yes | Yes | No (consistent with NPPF)     | Yes | Yes | Objects to the Allocations document as the plan does not fully meet the local need for housing within Whittington. Proposes land at Church Farm, Back Lane be allocated for housing development (50 dwellings). Allocations document is not justified as it has allocated sites that are not considered the best when compared to the alternatives. Site W1 (60 dwellings) is not being actively promoted and can only be delivered by undertaking significant alterations to the highway network. Sites W1 and W3 should be deleted and replaced by the land East of Common Lane and land at Church Farm, Back Lane, Whittington  |
| LPA 253 | William Brearley (CT Planning) on behalf of Touch Properties                          | Paragraph 4.7                              | Yes | Yes | Yes (not positively prepared) | No  | Yes | The Local Plan Allocations makes a commitment to review the Allocations document and the Strategy on the basis of addressing the housing needs of the GBHMA and Tamworth. However, there is no mention within the Allocations document about how best this need is met and the possible housing required. The Peter Brett report explains how the shortfall should be met on the edge of the Birmingham conurbation, which is washed over Green Belt towards Shenstone and Little Aston. Suggests that the Allocation Document indicates how it intends to assess sites. Proposes a Green Belt site at Shenstone Wood (16.2ha) which could deliver 400 dwellings at 35 dwellings per hectare with public open space and infrastructure.  |

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| LPA 254 | Christopher Timothy (CT Planning) on behalf of S Day (Lichfield Care Development Ltd) | Proposals Map   | Yes | Yes | No                        | Yes | Yes | The Proposals Map should be amended to delete from the Green Belt the area of land north of Lichfield Road, west of Grange Lane, east of Stafford Road from the Green Belt. The area contains Friary School, leisure centre, Nearfield House, care home, police training centre and a number of dwellings. The area identified to be deleted from Green Belt lies immediately adjacent to the Development Boundary of Lichfield, it is well related in terms of its scale and form to the established pattern of built development. All of the land uses are uses that are not appropriate within Green Belt.   |
| LPA 255 | Christopher Timothy (CT Planning) on behalf of South Staffordshire Water Plc          | Policy S1: Shenstone Housing Allocations                | Yes | Yes | Yes                       | No  | Yes | Supports allocation of Site S2: Land adjacent to Shenstone Pumping Station. The SHLAA identifies the site to be suitable, available and achievable for development and that there are no known constraints. The site is within 500m of the majority of services and facilities within the village, including its railway station. Capable of supporting 40 dwellings. South Staffordshire Water Plc are committed to bringing this site forward for development within the next five years.   |
| LPA 256 | William Brearley (CT Planning) on behalf of Mr Fateh                                  | Proposals Map   | Yes | Yes | No                        | Yes | No  | Promotes land at High Street, Colton for development. Argues there is evidence to demonstrate a need for affordable and open market housing within Colton. Council should be proactive to ensure that the housing needs of the rural hinterland of the district are met.  |
| LPA 257 | Christopher Timothy (CT Planning) on behalf of Mr Minshall                            | Policy AH1: Armitage with Handsacre Housing Allocations | Yes | Yes | No                        | Yes | Yes | Local Plan Allocations document has not been positively prepared as it does not meet the local needs for housing arising from Armitage with Handsacre. Although the document allocates a site that in addition to completions and committed sites exceeds the identified requirement of between 120-220 homes, the Council are relying on a single large site. Out of the 5 Key Rural Settlements Armitage with Handsacre has the least constraints as 3 of the others are constrained by Green Belt. Proposes land adjacent The Crown Inn, Uttoxeter Road as a site for 88 dwelling as it is well related in terms of scale and location to the existing scale of development in the village. Proposes that the settlement boundary be extended to incorporate the site.   |
| LPA 258 | William Brearley (CT Planning) on behalf of Friel Homes                               | Policy LC1: Lichfield City Housing Allocations          | Yes | Yes | No (consistent with NPPF) | Yes | Yes | Allocations document has not been positively prepared as it does not allocate an important, undeveloped site within the City, the site located between and to the rear of Angel Croft Hotel and Westgate House. The Urban Capacity Assessment acknowledges that the site was available and a revised scheme forthcoming. The District and City relies on large urban extensions to deliver the majority of housing. Smaller sites within the City should be allocated to ensure adequate flexibility in the housing supply. Allocation of the site would provide opportunity for the community to experience heritage assets and views towards Darwin House and the Cathedral.  |
| LPA 259 | Christopher Timothy (CT Planning) on behalf of Essington Park Ltd                     | Policy A1: Alrewas Housing Land Allocations             | Yes | Yes | No                        | Yes | Yes | Supports the proposed allocation of Site A2: Land North of Dark Lane. The SHLAA notes that development of the land north of Dark Lane is suitable, available and achievable for housing and that there are no known constraints to the site's development. The Local Plan Allocation document understates the yield for the land of North Lane. Planning permission has been granted for 121 dwellings on the eastern portion of the proposed allocation. Further 19 dwellings can be accommodated increasing the yield to 140 dwellings, which would be within the range identified by the Local Plan Strategy (minimum 90-180 homes).   |
| LPA 260 | Christopher Timothy (CT Planning) on behalf of Essington Park Ltd                     | Local Plan Allocations document                         | Yes | Yes | No                        | Yes | Yes | Local Plan Allocations document is not positively prepared as it fails to meet local needs for infrastructure, particularly the need for roadside service areas on the Strategic Road Network. District is on three major road networks; A5, A38 and M6 toll. Proposes allocating a Roadside Service Area to the north of Alrewas which could include provision for a petrol filling station, food outlet, hotel accommodation and 24 hour HGV parking. Could replace Ivy Garage in Alrewas providing opportunity to remove HGV traffic from the village. No specific policy in the Allocations document that addressed road side services.   |
| LPA 261 | Chontell Buchanan (First City Ltd)  | 4.1-4.8   | No  | Yes | No                        |     |     | LDC should consider accommodating Birmingham & Tamworths unmet housing need at this stage.<br><br>Supports Policy B1 and the allocation of B:14 Land south of Highfields Road, Burntwood. Council have taken a pragmatic approach to meet housing needs of the District and acknowledged there is insufficient land to meet the needs of the District on brownfield land therefore allocated Green Belt land to meet the need. Consider the Council should allocate additional sites that can be removed from Green Belt to accommodate future growth beyond the plan period and these should be identified as Safeguarded sites.<br><br>Clear evidence the urban capacity is unable to accommodate the required growth for the district. Consider Councils approach for the release of land within greenbelt and greenfield sites on the edge of villages is the only justified approach to meeting the housing requirements. It will not be possible to meet the needs of the greater Birmingham housing market area within the urban area and there is a need to consider additional greenfield sites and greenbelt sites. It is an appropriate time for consideration of additional sites that will need to be removed from the Green Belt to assist with the further needs of Lichfield District beyond the plan period and needs of the GBHMA and this should not be left until a review of the local plan.<br><br>Paragraph 178-181 NPPF references DtC and makes it clear the current housing land supply issue within the GBHMA should be considered at this stage. The LPA should consider safeguarding Green Belt land for future development. |
| LPA 262 | Richard Brown (CBRE Ltd) on behalf of IM Properties                                   | Local Plan Allocations Document                         |     |     |                           |     |     | Objects to the omission of the Watery Lane development as an allocation within the Allocations document. Site has extant planning permission granted by the Secretary of State on 13th February 2017. Also subject to a S106 agreement dated 20th December 2016. Discussions are being advanced by Planning Officers to coordinate the discharge of various planning obligations, pre-commencement conditions and certain reserved matters applications to facilitate delivery of the development. The site should be identified in the Allocations document for these reasons.   |
| LPA 263 | Karin Hartley (Delta Planning) on behalf of New Street LLP                            | Site L27 (Lichfield)                                    | Yes | Yes | Yes                       | No  | No  | Supports the allocation of Site L27: Former Norgren Site, Eastern Avenue for a mixed use allocation under policy LC2. Site will provide up to 70 homes on a brownfield site within the urban area contributing to the District's housing supply in a sustainable location. Also provides bulky good retail scheme to meet requirements identified by Policy Lichfield 3 in the Local Plan Strategy. Provides a suitable and sustainable location for proposed uses and the site is considered developable within the Local Plan period.   |

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| LPA 264 | Karin Hartley (Delta Planning) on behalf of Prologis UK Ltd           | Site F2 (Fradley)                       | Yes | Yes | Yes | No  | No  | Support the allocation of 18.2ha of employment land at Site F2: Land south of Fradley Park. The allocation will make significant contribution towards the District's employment land supply. A planning application for the site is currently being considered by LDC. There is active market interest to bring forward employment development at the earliest opportunity, therefore it is considered deliverable within the Local Plan period. Considers the additional employment land in the Allocations document increases flexibility and choice, supporting the Government's commitment to secure economic growth.   |
| LPA 265 | Jason Tait (Planning Prospects) on behalf of Lioncourt Homes          | Policy A1 (Alrewas Housing Allocations) | Yes | Yes | No  | Yes | Yes | Supports the Dark Lane site being recognised in the Allocations. It should be appropriately described as a commitment and included within the settlement boundary. The identification of the site to accommodate 110 dwellings in the Allocations document should be increased to 121 dwellings in line with the planning permission granted. The extent of the site in the plan should be amended to reflect the site for planning permission granted and should also include additional land to the north and east as they are intergral parts of the planning permission area as they provide floodplain compensation works and adequate space for vehicular access onto Micklehome Drive  |
| LPA 266 | Chontell Buchanan (First City Ltd)                                    | Policy B1, Site B14                     | Yes | Yes | Yes | Yes | Yes | LDC should consider accomodating Birmingham & Tamworths unmet housing need at this stage.<br><br>Supports the allocation of Site B14: Land south of Highfields Road, Burntwood. Site will provide approx 250 dwellings that will help meet the needs of Burntwood. Burntwood is set in the greenbelt, due to lack of capacity within urban area it is absolutely necessary that a greenbelt site would need to be allocated to assist Burntwood in meeting its adopted housing land supply requirements<br><br>Site B14: Land south of Highfields Road is the most appropriate green belt to be allocated for residential development and there are not any other reasonable alternatives. Green belt Review 2016 identified parcels land to the north of Burntwood are important to safeguard the countryside from encorachment, and carry greater importance in regards to the purpose of the Green Belt and therefore should not be removed.<br><br>Confirms Site B14 is sustainable and deliverable within 5 years of the adoption of the Local Plan Allocation Document. A range of technical documents have been prepared to support development and there is no reason from a technical perspective why the site cannot be allocated and developed.<br><br>Does not consider the Watery Lane, Curborough decision has any bearing on the requirements of Burntwood and requirement for the LPA to conform the to Local Plan Strategy.  |
| LPA 267 | Jason Tait (Planning Prospects) on behalf of Wallace Land Investments | Paragraphs 1.10, 4.7 & 4.8              | Yes | Yes | No  | Yes | Yes | The paragraphs (1.10, 4.7 & 4.8) confirms the Council is committed to review its Plan in full to address the GBHMA shortage. It also confirms that the Council continues to work proactively with partners to identify appropriate amount of growth to be accommodated within the District. The commitment to a Review of the Plan is supported. Now the unmet housing needs of Tamworth are now known (further 825 dwellings beyond 1000 accommodated in part between Lichfield and North Warwickshire) they should be addressed as part of the Allocations Plan. A more dispersed strategy over concentrating delivery in certain key locations will promote delivery within the District.  |
| LPA 268 | Chontell Buchanan (First City Ltd)                                    | 9.4-9.9                                 | Yes | Yes | Yes | Yes | Yes | LDC should consider accomodating Birmingham & Tamworths unmet housing need at this stage.<br><br>Paragraph 9.4-9.9 make clear that their focus is on providing the needs for Burntwood, these do not make any reference to meeting the needs of adjoining local authorities. Burntwood is in close proximity to the West Midlands Conurbation and is identified alongside Lichfield as the most sustainable settlements within the District therefore it would be appropraite for both settlements to assist ahead of smaller less sustainable sites when it comes to allocating additional sites to meet housing need.<br><br>Consider the Council has taken a pragmatic approach to allocating sites for residential development and supports the allocation of Site B14: Land south of Highfields Road. Giving the circumstances of Burntwood being inset within the greenbelt and the urban area being unable to accommodate the residential needs of the settlement it is justified for the removal of sites from the greenbelt to meet the required housing need. Consider exceptional circumstances have been proven by the fact that during the greenbelt review sites B14 have been identified as not performing well when considered against the reasons for including land within the greenbelt and due to the need of land in order to meet the housing needs.<br><br>The local plan allocates sufficient sites to meet the housing numbers for Burntwood in accordance with the Local Plan Strategy. |
| LPA 269 | Jason Tait (Planning Prospects) on behalf of Wallace Land Investments | Policy A1 (Alrewas Housing Allocations) | Yes | Yes | No  | Yes | Yes | Sites at Alrewas should be reconsidered as follows ;<br>A1 – Park Road Printers – the site (net) is so small it should be treated as a windfall<br>A2 – the land north of Alrewas – the site has permission and should be recognised as a commitment<br>A3 – Bagnall Lock and A4 – New Lodge should be treated as a commitment<br>Sites should be deleted or proposed yields reduced in line with objections raised.  |
| LPA 270 | Chontell Buchanan (First City Ltd)                                    | Policy B1                               | Yes | Yes | Yes | Yes | Yes | Supports Policy B1 and the allocation of Site B14: land south of Highfields Road.<br><br>Considers the most appropraite strategy has been presented against reasonable alternatives based on proportionate evidence. Clear there is insufficient land within the urban area and on brownfield land to accommodate the needs of Burntwood there need to allocate greenfield sites and greenfield sites will have to be selected from the Green Belt that surrounds Burntwood on all sides. Policy B1 is the most appropraite strategy in providing a deliverable and justified plan.<br><br>Consider it is of upmost importance for the 19 allocations identified in policy B1 to remain in the Local Plan Allocations to meet the needs of Burntwood. It is imperative that site B14 is removed from the Green Belt.  |

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| LPA 271 | Jason Tait (Planning Prospects) on behalf of Wallace Land Investments | Policy FZ1 (Fazeley Housing Allocations)                | Yes | Yes | No  | Yes | Yes | <p>FZ1 - Land west of Sir Robert Peel Hospital – the site is in close proximity to the A5 which because its dual carriageway at this point – the potential for the need for significant landscaped buffers to screen the development and provide appropriate noise bunding would reduce the net developable area and potential dwelling yield from this development.</p> <p>FZ2 –Tolsons Mill – Whilst the principle of development at this valued listed building is not objected to, no reliance upon delivery of housing from this site should be placed in the Local Plan – the development is complex involving the conversion and adaptation of listed buildings – there has been no financial feasibility to demonstrate development yield not its financial viability.</p> <p>FZ3 – The Green – the site does not have a clear and suitable access to support the development.</p> <p>The sites should be deleted or proposed yields reduced in line with the objections raised.</p>   |
| LPA 272 | Jason Tait (Planning Prospects) on behalf of Wallace Land Investments | Policy OR1 (Other Rural Housing Allocations)            | Yes | Yes | No  | Yes | Yes | <p>KB1 – Lichfield Road, Kings Bromley and OR2 – Lamb farm - these sites have planning permission and should be treated as a commitment.</p> <p>OR1 –Packington Hall and OR4 –Derry Farm – these sites are in remote locations and the number of dwellings proposed should be reduced considerably in order to minimise travel.</p> <p>OR3 - Foothery Hall – The contribution of development from this site should be considered in net terms given its former use - the site has planning permission and should be treated as a commitment.</p> <p>OR5 – Station Works – the shape and form of this site only lends itself to minimal development, especially given the proximity of the railway line – the scale of development proposed for this site should be reduced.</p> <p>The sites should be deleted or proposed yields reduced in line with the objections raised.</p>  |
| LPA 273 | Jason Tait (Planning Prospects) on behalf of Wallace Land Investments | Policy AH1: Armitage with Handsacre Housing Allocations | Yes | Yes | No  | No  | Yes | <p>Land adj Hayes Meadow School (Site AH1) has planning permission and should be treated as a commitment.</p>  |
| LPA 274 | Jason Tait (Planning Prospects) on behalf of Wallace Land Investments | Paragraph 4.1   | Yes | Yes | No  | Yes | Yes | <p>It is noted and accepted that the Allocations document is not revisiting the overall need for housing which was set out in the Local Plan Strategy. It is critical that the Allocations document makes sufficient land available in viable and deliverable locations to provide choice and range throughout the plan period. Significant reliance on Strategic sites (SDAs) – not yet provided the increase to supply required. Allocation sites will have key role in providing additional range of small to medium sites which are key to effective delivery.</p> <p>Plan confirms that in the 8 years to 1 April 2016 the District has delivered an average of 235 dwellings per year (1,881 net new homes); significantly lower than the average annual requirement of nearly 480 dwellings to meet the Plan requirement (even more factoring the shortfall). Addressing shortfall and promoting a deliverable trajectory will require a broad range of sites. 2,299 homes are left to be identified after the SDAs (5,850 dwellings) and completions are taken into account on the assumption the SDAs deliver within the plan period. Concern that the overall delivery within the Plan is going to be compromised.</p> <p>It is noted that Table 4.1 (Housing Distribution and Delivery) replaces similar Table (8.1) in the Local Plan Strategy. Overall distribution remains consistent with the LPS but there are subtle changes in allocations and distributions between settlements which could have implications on delivery. The additional 10% provision over the minimum requirement in the LPS is supported, but over reliance upon windfalls and the strategy which focused 36% of growth in Lichfield may need to be reconsidered if the overall Plan requirement is to be met. Over reliance is also placed on sites within urban area which have known to be available for some time. Given the modest delivery rate over the first 9 years of the plan and the limited number of years left in the Plan, a greater range of sites is required. The NPPF states that “The Government’s key housing objective is to increase significantly the delivery of new homes”. It goes on to state that “to enable this the planning system should aim to deliver a sufficient quantity, quality and range of housing”.</p> <p>If the Plan doesn’t deliver the housing growth it would have significant impact on housing affordability which is a major factor affecting the District. It could also lead to unsustainable patterns of work.</p> |
| LPA 275 | Chontell Buchanan (First City Ltd)                                    | 4.1 - 4.8   | Yes | Yes | Yes | Yes | Yes | <p>Para 4.1 identifies the requirement to deliver a minimum of 10,030 dwellings by 2029. Document confirms 1881 dwellings have been completed since the start of the plan period however it fails to identify this number includes any from the SDA, this should be clarified to ensure there is no duplication of housing figures.</p> <p>Agrees with the approach to focus housing growth on a number of key sustainable settlements. Important to Burntwood to accommodate 13% of the overhall housing target.</p> <p>Appreciate Councils approach towards meeting its own housing needs in the first instance, however need to consider the requirements of neighbouring authorities where it is possible to do so. The need within the GBHMA are immediate and cannot be put off for a significant number of years.</p> <p>Supports Policy B1 and allocation of site B14.</p> <p>The plan should be effective and deliverable in regard to housing provision given the Councils calculations of housing need taking into consideration that Council have allowed for an approx 11% supply of dwellings in excess of the minimum 10,030 dwellings required of the local plan.</p>  |

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| LPA 276 | Jason Tait (Planning Prospects) on behalf of Wallace Land Investments | Site F1 (Fradley)                                 | Yes | Yes | No | No  | Yes | The land at Bridge Farm Fradley should be treated as a commitment.   |
| LPA 277 | Jason Tait (Planning Prospects) on behalf of Wallace Land Investments | Policy R1: Rugeley Housing Allocations            | Yes | Yes | No | Yes | Yes | Land at Rugeley Power Station is not objected to, in principle it is a significant brownfield site suitable for development. Full 800 dwellings should not be allowed for in this plan period as it is a complex development which requires remediation and specialist developer. Unlikely to be remediated, readied for development, permission granted and development progressed such that 800 homes would be delivered in 10 years.<br><br>Part of site falls within adjoining District and is not allocated for development - a consistent and co-operative approach needs to take place between two Authorities.   |
| LPA 278 | Jason Tait (Planning Prospects) on behalf of Wallace Land Investments | Policy BE2: Heritage Assets                       | Yes | Yes | No | Yes | Yes | The general approach to preservation and enhancement of heritage assets is supported however the Policy is not consistent with national planning policy in that it doesn't recognise the difference between substantial and less than substantial harm, or the appropriate balance within the Framework that may judge benefits against harm. The Policy suggests that development may be supported where there will be no harm to heritage assets and this is not consistent with the Framework.  |
| LPA 279 | Jason Tait (Planning Prospects) on behalf of Wallace Land Investments | Policy NT1: North of Tamworth Housing Allocations | Yes | Yes | No | Yes | Yes | NT 1 – Arkall farm – The site is allocated for 1000 dwellings however the full 1000 dwellings should not be allowed for in this plan period – a detailed trajectory needs to be prepared in order to understand the likely realistic delivery of development on this site given the likely need for new infrastructure, the site preparation for development, permission granted and development progressed such that 1000 dwellings would be delivered within the remaining 10 years of the Plan from adoption, noting also other competing sites for delivery concurrently in this part of Tamworth.<br><br>NT2 - Browns Lane should be treated as a commitment  |
| LPA 280 | Jason Tait (Planning Prospects) on behalf of Wallace Land Investments | Site S1 (Shenstone)                               | Yes | Yes | No | Yes | Yes | Whilst its recognised that the site is allocated in the adopted Shenstone Neighbourhood Plan, there does need to be some consideration of the likelihood of this mixed use proposal delivering housing in the Plan period, particularly given the existing established uses on site.   |
| LPA 281 | Jason Tait (Planning Prospects) on behalf of Wallace Land Investments | Policy B1: Burntwood Housing Allocations          | Yes | Yes | No | No  | Yes | Proposes a site at land west of Farewell Lane for up to 305 homes providing a deliverable and sustainable housing site option at Burntwood. The site extends 15.87ha with good access to local services and infrastructure, and is being actively promoted for development.<br><br>The site has potential to deliver 7.13ha of Green Infrastructure including Public Open Space, areas of structural planting, potential access from Farewell Lane, central Greenspace with equipped play areas, preservation of existing Public right of way, extensive new planting.<br><br>A detailed understanding of the site and its development potential has been gained through research into transport, access, ecology, green infrastructure, heritage and landscaping informing an emerging Illustrative Development Framework for the sites development.<br><br>There are no environmental impediments to the sites delivery. Development at the site would provide contribution in the early part of the Plan period, protect environmental assets and development would not affect historic character or setting of the District, nature conservation, green infrastructure or floodplain.<br><br>If the site is not allocated then at the least the land should be removed from Greenbelt and safeguarded for future development.  |
| LPA 282 | Jason Tait (Planning Prospects) on behalf of Wallace Land Investments | Policy B1: Burntwood Housing Allocations          | Yes | Yes | No | No  | Yes | Site B1 and B17 - sites are so small so should be treated as windfall and does not need to be allocated.<br>Site B3 - loss of playing field is contrary to national policy, residential development should be focused on previously developed part of site<br>Site B4 and B10 - sites are within established employment area therefore not appropriate to allocate for housing. Site is also adjacent to employment uses which would detrimentally impact future residents. May be suitable for employment allocation.<br>Site B5 - unique opportunity for use by Primary School therefore not allocated for housing. Access to serve onto Chase Terrace is unsuitable for housing.<br>Site B8 - Site is in active use and delivery from this site shouldn't be relied upon.<br>Site B9 - Scale of development amounts to over 100dph therefore too high - should be treated as windfall.<br>Site B14 - Object to this Green Belt allocation, developmenty would significantly erode gap at Brownhills. Detrimental to role of Green Belt to the south of Burntwood at the back of Highfields Lane. Site is close to M6 toll, potential for noise which casts doubt on the sites suitability for housing.<br>B15 - Questions whether site would accommodate suggested number of dwellings given density of surrounding area. Acces constrained by Coulter Lane whose rural character would be affected by highway upgrades. Site more suited to smaller low density development.<br>B6, B11, B12, B18, B19 - site should be treated as a commitment. |

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| LPA 283 | Michael Davies (Savills) on behalf of The Crown Estate   | Policy LC1 (Sites L3, L8, L20, W4 and OR4)     | Yes | Yes | No                           | Yes | Yes | Promotes land to the south of Abnalls Lane, Lichfield (SHLAA ref 16) for development to deliver between 19-23 dwellings. Consider Abnalls Lane offers a more suitable and sustainable alternative to the proposed sites L3, L8, L20, W4 and OR4. The SHLAA assessed land south of Abnalls Lane is a more suitable, available and achievable and it can be delivered immediately. Although the site is within Green Belt it was not assessed within the Green Belt Review. Consider that the site does not have the essential Green Belt characteristic of openness. Do not consider the Council has provided enough evidence to justify why the Abnalls Lane site has not been selected.  |
| LPA 284 | Richard Brown (CBRE Ltd) on behalf of landowners in respect of land adjacent to Crown Inn, Handscare | Table 4.1 and Armitage with Handsacre          | Yes |     | No (not positively prepared) | Yes | Yes | Promotes land adjacent to the Crown Inn, east of Uttoxeter Road, Handscare.<br><br>Consider the Council has under-allocated housing sites to robustly meet the LPS housing requirements for the Key Rural Settlements and does not ensure a flexible supply of land across the plan period. The LPS currently fails to provide sufficient land in Armitage with Handsacre to meet its requirements. Council should consider allocating land adjacent to the Crown Inn, Handscare for 88 dwellings.  |
| LPA 285 | Jason Tait (Planning Prospects) on behalf of Wallace Land Investments                                | Policy LC1: Lichfield City Housing Allocations | Yes | Yes | No                           | Yes | Yes | Site L1 - Scale of housing is too high given that in policy the existing building is out of scale and character with the area.<br>Site L2 - Further increasing the size of the SDA is objected to and should not be part of the Allocations Plan which should focus on range of alternative additional sites.<br>Site L3 - Site is within established employment area therefore not appropriate to allocate for housing. Site is also adjacent to employment uses which would detrimentally impact future residents. May be suitable for employment allocation.<br>Site L4 - Plan recognises with the demolition of former building, proposals for housing on this site should be considered in net terms only.<br>Site L6 - Site is in higher risk flood area, not been demonstrated sequentially other sites are not available to justify development outside of FZ1. Site is also in mixed commercial area with uses that could be detrimental to the amenity of future occupiers<br>Site L7 - Site dominated by existing trees subject to Tree Preservation Order, site is not likely to deliver 27 dwellings on 0.7ha site with significant tree protection areas reducing net developable area.<br>Site L8 - Loss of playing field contrary to national policy, part of site should be retained for recreation use.<br>Site L9 - Site is unsuitable for housing due to elevated position in direct proximity to A38 and Burton Road.<br>Site L10 - Principle of site is accepted however site adjoins an existing intrusive employment use including trailer park which has potential to impact upon amenity of future residents. Site is only 1ha and with constraints and in context of other nearby residential areas would not be appropriate for 38 dwellings.<br>Site L11 - Planning permission for 6 dwellings should be treated as a commitment.<br>Site L12 - Sensitive site due to its setting adjacent to Grade 1 listed St Johns Hospital, prominent trees along boundary of site subject to TPO. Unclear of sites extent of balance beyond the permission for 18 dwellings and therefore its suitability to accommodate the further development proposed.<br>Sites L13, L15 and 25 - Sites should be treated as a commitment.<br>Site L14 - Principle of site is accepted however site adjoins West Coast mainline which has the potential to impact on future residents. Significant buffer landscaped area and bund will be required. Site is only 2.7ha with constraints and in context of other nearby residential areas would not be appropriate for 99 dwellings.<br>Site L16 - Site shouldn't be allocated, could be treated as windfall. Site has been vacant for some time and is in the urban area. Scale of housing is too high given its immediate context.<br>Site L17 - Site shouldn't be allocated, could be treated as windfall. Site has been vacant for some time and is in the urban area. Scale of housing is too high (nearly 100dph) given its immediate context. Site affected by TPO which limits net developable area. Site near to |
| LPA 286 | Gill Brown (Nigel Gough Associates) on behalf of Booth Trustees                                      | Table 5.1                                      |     |     |                              | Yes | Yes | Land at Fradley (SHLAA Ref: 132) has had an employment allocation since 1980s and is incapable of development for employment, its land use allocation should be amended. It cannot be reasonably and positively delivered for employment as the only access would be through the existing site where there are already pre-existing and long term arrangements for the existing committed development.<br><br>With regards to DtC, question whether sufficient housing growth has been incorporated into the Lichfield Site Allocations to 2029 to defray its appropriate share of the emerging housing shortfall projections that will emanate from the the review of BCC Development Plan.<br><br>With regards to legal and procedural requirements, Policy EMP1 indicates proposals outside tradition use classes will not usually be supported. SHLAA ref 132 is not suitable for this Use Class.<br><br>Local Plan Allocations document could be more positively delivered if existing allocations were fully appraised on a, say 5 year basis to ensure that it is kept up to date.<br><br>Where land use allocations do not 'fit', there must be the ability for reasonable changes to be made to allocations to reflect the location and settings of landholdings.<br><br>Table 5.1 indicates employment at Fradley through the implementation of existing commitments and development / redevelopment within existing employment areas. The site (SHLAA Ref 132) has had an employment allocation since 1980s and is incapable of development for employment. The site could better serve the need of Lichfield DC if the land were allocated for housing.   |



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| LPA 287 | Geoff Armstrong<br>(Armstrong Rigg<br>Planning) on behalf<br>of Avant Homes | Policy B1:<br>Burntwood<br>Housing<br>Allocations   |     |     |    |     |     |  | <p>Proposing a site at Land at Ogle Hay Road/ Rake Hill/ Meg Lane, Burntwood with indicative yield of 246 dwellings. Site has been submitted through Call for Sites on 12th February 2016 which included indicative master plan, context plans to local services, public transport facilities, landscape constraints, transport review and flood risk review. Supplemented by comparative assessment of the site with other potential sites in Burntwood's Green Belt and performed well compared to others.</p> <p>Above information has either been ignored or overlooked as 2016 SHLAA assessment is identical to 2015 SHLAA, no explanation from the Council has been forthcoming regarding this issue. The assessment of this site is identical in every version of the SHLAA since 2009.</p> <p>A proactive and positive approach be adopted towards identifying sites which could contribute to meeting unmet needs from Birmingham and Tamworth. As there is no timetable for the Local Plan Review the Local Plan Allocations DPD should identify reserve sites capable of accommodating unmet needs from Tamworth and Birmingham.</p> <p>Site B15 only fulfills minor or moderate roles in Green Belt functions in the 2016 Green Belt Assessment. However, in a previous assessment of the site submitted Feb 2016 as part of the comparative assessment of Green Belt sites there was constrained access from Coulter Lane to the west. The sustainability of the site also scored poorly due to the distance from shops and services, public transport and employment centres. The proposed site is considerably closer and therefore a more sustainable choice.</p> <p>In the 2016 Green Belt Review, Site B14 is considered to perform an important role in preventing the merging with Brownhills. The allocation does not provide the type of permanent boundary described by the NPPF (para 85). Allocation would also bring development closer to major noise source of M6. By contrast the proposed site would have a permanent boundary in the form of Meg Lane. It serves a minor function in preventing the merging of neighbouring towns.</p> <p>The proposed site serves no greater Green Belt purpose than Sites B14&amp;15 but has additional benefits in terms of loss of Green Belt function.</p> <p>The proposed site should replace B14 and Site B15 should be omitted.</p> <p>If B14 and B15 are retained, the proposed site should be identified as a reserved housing site.</p> |
| LPA 288 | David Stanton<br>(Burntwood<br>Churches United)                             | Section 9:<br>Burntwood   |     |     |    |     |     |  | <p>Support the proposals of Burntwood Action Group to create shopping and residential hub to include Emanuel Church. Concerned about growth of town without further shopping and leisure facilities. Concerned about development on Green Belt land altering drainage patterns and risk of localised flooding.</p> <p>Not enough homes suitable for first time buyers and single parent families, provision of 1/2 bedroom apartments will redress the imbalance. Emanuel Church does not have space to expand their Foodbank, the Foodbank would be better placed at a centre so whole community can benefit.</p>  |
| LPA 289 | James Beynon<br>(Quod) on behalf of<br>Evans Property<br>Group              | Policy EMP1,<br>Site<br>Allocation F2,<br>Proposals<br>Map &<br>Fradley<br>Existing<br>Employment<br>Area<br>Boundary | Yes | Yes | No | Yes | Yes | <p>Supports the principle of employment and supporting uses in Fradley. However as currently prepared the Draft Plan is unsound in respect of the following matters, as the approach is not justified as the most appropriate strategy considered against reasonable alternatives.</p> <p>The policy text to Site Allocation F2 should be made explicit that non-B Use Class operations are acceptable, particularly given the site's historical allocation for a hotel (in-part)</p> <p>Draft Policy EMP1 should be amended to positively support non-B Use Class operations where these are appropriate, and to ensure the flexible use of land consistent with the NPPF.</p> <p>Notwithstanding the above recommendation RE Policy EMP1 to support appropriate non-B Use Class uses within the 'Existing Employment Areas', the Council's inclusion of 'Employment Sites 1-3' (as shown at Appendix 1) within the Existing Employment Area at Fradley, and the acceptance of B1/b2/b8 uses in principle at these locations, is welcomed.</p> <p>The Midland Karting site should be included within the Fradley 'Existing Employment Area.' This site is brownfield land, it functions as part of the Fradley Business Park area and it would effectively round off the employment boundary in this location.</p> <p>The Council's preference to consider land to the west of Gorse Lane as part of any future plan review is noted. In line with the Government's Housing White Paper , the Council should commit to a review of their Local Plan every 5 years to ensure that it is kept up to date.</p> |   |
| LPA 290 | Tom Armfield<br>(Turley) on behalf of<br>Bovis Homes Ltd                    | Policy NT1:<br>North of<br>Tamworth<br>Housing<br>Allocations   | No  | Yes | No | Yes | Yes | <p>Plan doesn't comply with DtC in terms of housing delivery. The Local Plan Strategy is clear that the Tamworth shortfall should be addressed through the Allocations document and not a review of the strategy. No clear evidence that there is constructive dialogue between the three authorities as required by para 181 of the NPPF. Until LDC accommodates some of Tamworth's shortfall through the Allocations document the Plan does not comply with DtC.</p> <p>Not positively prepared in current form. Unreasonable to delay accommodating Tamworth's shortfall until future Local Plan Review when the GBHMA shortfall is also addressed.</p> <p>Sustainability Appraisal only considers options in regards to Lichfield's own needs and appraises no options that would accommodate Tamworth's shortfall.</p> <p>Proposes site at Gillway Lane, Tamworth (15.8ha) for 375 dwellings, benefits from variety of services nearby in Tamworth and Wigginton. Well located near to public transport. Site is wholly located in Flood Zone 1, no TPO's, no listed buildings or monuments on site. The SHLAA 2016 considered the site to be suitable, available and developable for residential development. Technical evidence base being prepared ahead of outline planning application.</p>  |   |

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| LPA 291 | Robin Stubbs   | 12.14 - 12.16<br>Policy S1, S2<br>& S3                 | No  | No  | No | Yes | <p>Site S2 should be deleted</p> <p>Site S3 should be deleted</p> <p>Consider releasing more land for housing adjacent to the NP agreed 2.1 ha of land at Shenstone Business Park (Site S1)</p> | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</p> |
| LPA 292 | Julie O'Rourke<br>(Tetlow King<br>Planning) on behalf<br>of West Midlands<br>HARP Planning<br>Consortium | Policy EMP1:<br>Employment<br>Areas and<br>Allocations |     |     |    |     |   | <p>Understands the Councils aspirations to protect and redevelop employment sites to contribute to delivery of 79.1ha of employment land, however encourages the Council to consider para 22 of the NPPF that states the long term protection of sites should be avoided when there is no real prospect of a site being used for employment.</p> <p>Employment land has not been designated in perpetuity so if more suitable uses are available the Council should take this into consideration via policy similar to that of para 22 of the NPPF. This will ensure the Plan is in accordance with national policy and is found 'sound' at examination.</p>  |
| LPA 293 | Yvonne Stubbs  | 12.14 - 12.16<br>Policy S1, S2<br>& S3                 | No  | No  | No | Yes | No  | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concern relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</p> |
| LPA 294 | Laura McCombe<br>(Asbury Planning)<br>on behalf of Muller<br>Property Group                              | Local Plan<br>Allocations<br>Document                  | Yes | Yes | No | Yes | Yes   | <p>Promotes land to the north of Alrewas Road, Kings Bromley for the development of approx 77 dwellings.</p> <p>Consider Council's 5 yls is marginal given that there is only at best a surplus of 307 dwellings. Council have been over optimistic in their approach to assessing housing delivery on a number of sites and it is highly likely that the Council will experience continuing delays on their committed and allocated sites, in particular the larger sites the Council are heavily dependant on. Council have adopted a minimalist approach to allocating sites in the Allocations Document and place emphasis on delivery on larger allocated sites. This is not a positive approach.</p>  |

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| LPA 295 | James Chadwick on behalf of Staffordshire County Council        | Local Plan Allocations                       |     |     |    |     |     | <p><b>Transport</b></p> <p>Local Plan Allocations Document proposed some changes to distribution of development that could necessitate a refresh of the Lichfield District Integrated Transport Strategy that was last updated following Local Plan adoption in November 2015. The Transport Strategy should be broadly still fit for purpose but may need review and some revisions where the distribution of development has changed, alternative sites are proposed or have secured planning permission.</p> <p>Policy Lichfield 3: Lichfield Economy - CC recognises the importance of Friarsgate and is actively involved in detailed specification and delivery of mitigating highway works to make it acceptable in transport terms. Development of 12,500m2 Grade A office uses at Lichfield South Business Park extension is likely to lead to a significant increase in commuter journeys and measures to widen modal choice will need to be considered in any TA.</p> <p>Burntwood - Allocation B14: Land South of Highfields Road has potential to impact on Hospital Road route, which has previously been identified as being under route stress when a cumulative assessment was undertaken. Allocation B15: East of Coulter Lane requires assessment of A5190 Lichfield Road /Farewell Lane to establish whether traffic generated is likely to materially impact on junction capacity and route performance.</p> <p>North of Tamworth - North of Browns Lane benefits from planning permission. Arkall Farm requires further consideration. Based on existing evidence only 300 units can be deemed to be deliverable and Policy NT1 needs further explanatory text and should be expanded to explain the process and procedures where any deficit in housing capacity will be found.</p> <p>East of Rugeley - increase in 350 units compared to 450 units previously considered. Support the redevelopment of the former power station site and will continue to play an active role in the masterplanning.</p> <p>Once the appropriate technical work is complete, SCC will update the 2015 Lichfield District Integrated Transport Strategy with respect to the scale of junction improvements works previously proposed but also take into account addition mitigation identified through TA submitted pursuant to a grant of permission on allocated sites.</p> <p>East of Rugeley and North fo Tamworth are likely to have cross border transport implications.</p> |
| LPA 296 | John Moran on behalf of HSE                                     | Local Plan Allocations                       |     |     |    |     |     | Identified sites within HSE consultation zones, recommended reference in key development considerations.   |
| LPA 297 | Matthew Fox (RPS Planning) on behalf of Fradley West Consortium | Policy F1: Fradley Housing Allocations       | Yes | Yes | No | Yes | Yes | <p>Proposes a site at Fradley Junction for c.250 dwellings and employment. Development is in accordance with the LPS but has been previously overlooked for allocation. Various iterations of the SHLAA have confirmed the site as suitable and available, although questioned "achievability" which promoters have confirmed is not in doubt. The development has previously been dismissed by Council Officers as it was deemed strategic in scale despite only being promoted for c.250 dwellings.</p> <p>Seven Green Belt sites have been released to provide over 500 dwellings rather than allocate a brownfield site. These sites have technical constraints as well as being in direct conflict with national planning policy and the emerging Housing White Paper.</p> <p>The proposed site should be allocated to offset the need for Green Belt release in Lichfield. It could also be allocated as part of the GBHMA shortfall or to ensure there are no shortfalls at Rugeley Power Station.</p>  |
| LPA 298 | Matthew Fox (RPS Planning) on behalf of Fradley West Consortium | Table 4.1: Housing Distribution and Delivery | Yes | Yes | No | Yes | Yes | <p>Considers that various aspects of the proposed supply are unsound:</p> <p>The housing requirement is expressed as a minimum - there is an 11% increase over the LPS housing requirement, this is insufficient when the housing requirement is expressed as a minimum. Housing supply in the Allocations document should be maximised to ensure Lichfield provides an appropriate contribution to the GBHMA's shortfall without the need for immediate Local Plan Review.</p> <p>Windfall Allowance should be offset in a Local Plan to avoid double counting with proposed allocations (many of the Key Rural Settlement allocations comprise of small windfall- type sites). Windfall allowance should only be included from 2025/26 onwards therefore the allowance should be reduced to 220 units.</p> <p>Housing supply from Rugeley Power Station is over-optimistic, should be reduced to c.550 dwellings.</p>  |
| LPA 299 | Matthew Fox (RPS Planning) on behalf of Fradley West Consortium | Paragraphs 1.10, 4.7 &4.8                    | No  | Yes | No | Yes | Yes | <p>The GBHMA Strategic Growth Study's findings will be available end of September 2017 - just before or whilst the Allocations Document is in examination. Not clear how LDC will respond to this evidence in preparing the Allocations Document. The GBHMA shortfall (37,900 dwellings to 2031) and the emerging shortfall identified by the Black Country Authorities (22,000 dwellings to 2036) means that LDC will have to make a significant contribution during the Plan period through the DtC process.</p> <p>Unsound and inefficient for Allocations Document to meet the needs identified in the Strategy and to review afterwards to address the shortfall. This would also exacerbate current delays to delivery of HMA's unmet needs.</p> <p>Allocations Document should make provision for additional residential site allocations to address Lichfield's contribution to the shortfall. Commitment to review should be delivered through policy in Allocations Document rather than through Explanatory text.</p> <p>LDC should allocate site at Fradley Junction for c.250 dwellings as part of the contribution to HMA's unmet needs in the Allocations document.</p>   |

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| LPA 300 | Steven Normal  | Burntwood                              |     |     |                                |     |     | Object to the use of Green Belt land for housing unless there are exceptional circumstances where the district and neighbours cannot accommodate more houses required. Curborough is not in Green Belt, is sustainable according to the SoS and so can lessen the pressure on the Green Belt which must take priority.   |
| LPA 301 | Kezia Taylerson on behalf of Historic England                            | Local Plan Allocations Document        |     |     |                                |     |     | <p>Policy IP: Lichfield Canal - support inclusion of this policy and welcome reference to Heritage Towpath Trail. Consider the policy would benefit from text that makes reference to enhancing the historic environment.</p> <p>Policy ST3: Road Line Safeguarding - has there been any assessment as to the impact to heritage as a result of the proposed route allocation</p> <p>Chapter 7 Built and Historic Environment - supportive of inclusion of historic environment policy. Recognise what the Council is trying to achieve however in its current form the policy is unsound as it is not effective or compliant with NPPF. Suggests amendments to the policy are required and recommends the Council refer to the NPPF and reword the policy.</p> <p>Makes a number of site specific comments, referring the SA in relation to site L1, L3, L4, L5, L6, L8, L11, L12, L13, L17, L18, L19, L20, L21, L22, L26, L27, L28, L29, L30, B15, NT1, R1, F1, A2, A3, A4, AH1, FZ2, W2, W3, W4, OR1, OR3, OR4 and HR1. Support approach set out in Appendix E and the preparation of a design brief / SPD.</p> <p>Where sites are proposed for allocation and SA identified harm may occur HE consider the inclusion of a design consideration to ensure that harm is avoided / mitigated. Where there are heritage assets on site or the setting of Grade II* or Grade I asset is affected HE require further assessment to be satisfied that the Plan complies with NPPF.</p> <p>HE comments focus on the need for some additional considerations or refinement of considerations as a result of the evidence base. Consider objections can be overcome by suggestions within the rep and would be willing to work with the Council to prepare a SOCG.</p> |
| LPA 302 | Michael Fox (RPS Planning) on behalf of Fradley West Consortium          | Policy R1: Rugeley Housing Allocations | Yes | Yes | No (positively prepared = yes) | Yes | Yes | <p>No objections to proposed allocation of Rugeley Power Station, but objects to the quantum of residential dwellings assumed to be deliverable/ developable during the plan period (minimum of 800).</p> <p>LDC and Cannock Chase District Council are preparing joint SPD, unlikely to be adopted before 2020 due to timescales associated with Allocation Document and CCDC's Local Plan Part 2 document. Further to this planning permission is unlikely to be secured until 2022 and remediation implemented before any completions are delivered. Completions will only deliver in the last 6 years of the plan and taking into account the annual average delivery rate for Rugeley (91dpa between 2010/11 and 2015/16), around 550 dwellings could be delivered during the Plan period. Assumed contribution from Rugeley Power Station is unjustified and overly optimistic and should be reduced to c.550 dwellings.</p> <p>Proposed site at Fradley Junction for 250 dwellings and employment land could address loss of deliverable/ developable supply from the Power Station site during the Plan period.</p>  |
| LPA 303 | Rachel Jones (How planning) on behalf of Grasscroft Homes & Property Ltd | Fradley                                | No  | Yes | No                             | Yes | Yes | <p>Promotes site to the south of Church Lane, adjacent Fradley Urban Area for development. Argues the site is in a sustainable and accessible location and development will provide economic, social and environmental benefits. The site is available, suitable and deliverable.</p> <p>Urban Capacity Assessment acknowledges there is evidence that Strategic Development sites in Fradley are likely to under deliver to the upper limit of the outline permission. As such, further sites should be allocated to accommodate for this.</p> <p>LPA document does not deliver enough housing for Lichfield. LPA document does not take account of any portion of the 37,900 additional homes which need to accommodate across the GBHMA. It is important that Lichfield District Council includes a clear mechanism for a full or partial review of its Local Plan within the Local Plan Allocations document for it be found sound. The Local Plan review mechanism should include specific timescales for an immediate Local Plan review following the publication of the Greater Birmingham Strategic Growth Study.</p>  |
| LPA 304 | Michael Fox (RPS Planning) on behalf of Fradley West Consortium          | Sustainability Appraisal               | Yes | No  | No                             | Yes | Yes | <p>SA contains factually inaccurate assumptions relating to site 838 (Fradley Junction). Obj 4 Q4 states that "there is a significant gap between the site and the key rural settlement of Fradley" and scored a double negative when the site will directly adjoin the new extended settlement boundary shown on Inset 12 of the Policies Map and should score at least a minor negative.</p> <p>Objective 5 Q1 states that the site is greenfield. The site is previously developed land with permanent structures. The sites brownfield status has been confirmed in the SHLAA.</p> <p>These factual errors render the SA process as flawed.</p> <p>Site at Fradley Junction should be allocated under Policy F1 for approximately 250 dwellings and employment land. Supporting document includes "Vision Document for Fradley Junction" including framework plan, planning context, environmental considerations and design evolution.</p>  |

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| LPA 305 | Sushil Birdi on behalf of Tamworth Borough Council          | Local Plan Allocations                   | No  | No  | No | Yes | Yes | <p>Tamworth is unable to meet all of its housing, employment and gypsy and traveller needs. Burntwood Local Plan Strategy commits to the provision of 500 houses towards the unmet need of 1,825 homes and to continue to work collaboratively on any further shortfall including a review of the plan or to be dealt with through the Allocations document. North Warwickshire have committed to provide 500 homes to meet the shortfall so there remains a 825 housing shortfall, a minimum of 14 ha of employment land and 1 Gypsy and Traveller pitch. Whilst some work has been undertaken at HMA level no further work has taken place within the two authorities on potential levels of affordable housing, sports and leisure facilities and infrastructure to support the level of housing proposed at the boarder.</p> <p>Arkall Farm development remains a serious concern for TBC in terms of the scale of development promoted and the impact on infrastructure. TBC objected to the allocation and planning application on the basis that the existing infrastructure is unable to support this level of development. It is not a sustainable site. There have been no discussions on the mechanisms to provide further infrastructure within Tamworth which would be needed to mitigate the impact of this or other allocations and no discussions about the provision of affordable housing within the scheme to meet Tamworth's needs.</p> <p>Arkall Farm proposes a contribution of 500 units to meet TBC unmet housing need, given the concerns it would be appropriate to consider an alternative site to meet the 500 units but also the balance of unmet need which amounts to 825 units.</p> <p>Commitment of 6.5ha of employment land to meet some of Tamworth's unmet needs is welcomed, however, clarification is sought on the basis of this figure.</p> <p>The Local Plan Strategy delegated the Tamworth shortfall to the Local Plan Allocations and it is now proposed to push this back to be considered with the HMA as part of the Local Plan Review. The matter is not being dealt with and it should not continue to be left unresolved. The LPA document should deal with the matter at this stage and the HMA shortfall can be addressed at the Local Plan Strategy Review.</p> <p>The housing allocations proposed at Fazeley should be considered to assist in meeting Tamworth's shortfall given their proximity to Tamworth.</p>  |
| LPA 306 | Michael Davies (Savills) on behalf of Barratt West Midlands | Policy B1: Burntwood Housing Allocations | Yes | Yes | No | Yes | Yes | <p>Consider that the Council's approach to site selection in Burntwood has not been soundly considered. Proposed site (land to the east of Rugeley Road, SHLAA ref 404) is a more suitable and sustainable alternative to Sites B14 and B15 and could deliver around 175 dwellings. Supporting technical documents including transport, flood risk and drainage, heritage and ecology.</p> <p>Proposed site was considered as "suitable, available but not achievable" due to the "unknown impact of SFRA, highway mitigation measures and sustainability impact on viability". SHLAA concluded the site was not developable, but LDC have provided no evidence to justify the conclusion that the site is unviable.</p> <p>Site B14 is not as well connected to the nearest neighbourhood centre as the proposed site it is also nearer to a primary school than site B14. Site B14 is part within Flood Zone 3 although the Allocations document states it is Flood Zone 1. If development is avoided in FZ3 it would reduce the net developable area from 11.8ha to 9.8ha and reduce the yield from 250 to 200 dwellings.</p> <p>Site B15 is identified in the SHLAA as being c.1.34ha and capable of delivering 31 dwellings, however the plan in the SHLAA is substantially larger. The plan should be amended to provide a more accurate site boundary reference.</p> <p>In the Supplementary Green Belt Report the proposed site was labeled under parcel BE1 and was assessed as moderately performing overall. In comparison site B14 (parcel BS1) was assessed as performing an important overall role. Parcel BE1 was the only moderately performing parcel that was assessed around Burntwood, all others served an important Green Belt role.</p> <p>In the Supplementary Green Belt Report it states that the site being able to accommodate 589 dwellings which is significantly more than is required to meet the LPS housing requirement for Burntwood. The figure of 589 dwellings has come from two separate promotions of land (SHLAA ref 494 for 444 dwellings and 404). Erroneous for the two sites to have been combined as they are distinctly different land parcels and also promoted by different land owners/ agents. Strongly consider parcel BE1 to have been incorrectly assessed therefore the site allocations in Burntwood is considered to be unsound.</p> <p>In the Sustainability Appraisal site B14 scored worse than the proposed site on "Within a Mineral consultation area". B14 scored better on; Landscape character, Historic buildings, value and protect distinctive character, close to sustainable transport.</p> |

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| LPA 307 | Peter Harris on behalf of Burtwood residents                 |                                 |     |     |    |     |     |  | <p>Save Our Green Belt petition with 278 comments opposing development in the green belt at Burntwood.</p> <p>Petition with 1006 signatures. Argue building should take place on Brown Field sites primarily and that housing should be affordable to local people, supported by more school places, better transport links and more GP and health services. Want to build a better Burntwood and not just a bigger Burntwood.</p> |
| LPA 308 | Mark Dauncey (Pegasus) on behalf of Smith Brothers Farms Ltd | Local Plan Allocations Document | Yes | Yes | No | Yes | Yes | <p>Promotes land adjacent Birchbrook Industrial Estate (SHLAA Ref: 953) as a sustainable location to meeting housing or employment needs in Shenstone.</p> <p>Table 4.1 of the draft Local Plan Allocations document is intended to replace Table 5.1 and Table 8.1 of the adopted Local Plan Strategy. Paragraph 1.3 suggests the remit of the Local Plan Allocations document is to deliver growth requirements in accordance with the LPS rather than establish a new distribution strategy as appears to be the case. The growth strategy contained in the LPS has been scrutinised and found to be most sustainable option for delivering growth across the District, concerned the apportionment set out at Table 4.1 of LPA document does not appear to have been tested within the most recent Sustainability Appraisal. The spatial distribution should remain consistent with the Local Plan Strategy, unless an alternative approach, with evidence to support it is prepared to fully justify it. The figures set out in Table 4.1 appear to be led by decisions already made rather than an attempt to deliver growth strategy of the adopted Local Plan.</p> <p>Concerned Table 4.1 includes sites intended for allocation, many of which have planning permission. No need to allocate sites where they are under construction as they clearly no longer require policy support to assist their delivery. Consider number of sites potentially undeliverable, or the Council's expectation on their yield seem very optimistic for example all three sites in Shenstone.</p> <p>Suggests Table 4.1 should be updated to show the overall requirement for each settlement, based on the percentages set out at Table 8.1 of the Local Plan Strategy. Sites that have been completed or under construction should be added to completions or commitments figures and not be included as proposed allocations and the capacity of several proposed allocations need to be revisited.</p> <p>Paragraph 1.10, Pg 7 and Paragraphs 4.7-4.8, Page 15: Important the LPAs document explicitly commit the Council the submit a replacement or revised Local Plan for examination by January 2020 and to incorporate an appropriate contribution towards Birmingham's housing needs. There needs to be a policy commitment to undertake a Green Belt and Local Plan Review by 2020.</p> <p>Housing Land Supply - Urban Capacity Assessment concludes additional sites beyond the existing settlement boundaries are required to ensure the delivery of the housing requirement and to realise the spatial development strategy established through the Local Plan Strategy. UCA provides a breakdown of completed, committed and additional supply by settlement within the conclusions and recommendations section at Chapter 5. There are a significant number of proposed allocations where there is a evidence to demonstrated undeliverability, or</p> |  |

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| LPA 309 | Mark Dauncey (Pegasus) on behalf of Mr D Wright       | Local Plan Allocations Document | Yes | Yes | No  | Yes | Yes | <p>Promotes land off Stockings Lane (SHLAA Ref: 134) as a sustainable location to meet the housing needs of Upper Longdon.</p> <p>Table 4.1 intends to replace Table 5.1 and Table 8.1 of the Local Plan Strategy. Paragraph 1.3 suggests the remit of the Local Plan Allocations document is to deliver growth requirements in accordance with the LPS rather than establish a new distribution strategy as appears to be the case. The growth strategy contained in the LPS has been scrutinised and found to be most sustainable option for delivering growth across the District, concerned the apportionment set out at Table 4.1 of LPA document does not appear to have been tested within the most recent Sustainability Appraisal. The spatial distribution should remain consistent with the Local Plan Strategy, unless an alternative approach, with evidence to support it is prepared to fully justify it. The figures set out in Table 4.1 appear to be led by decisions already made rather than an attempt to deliver growth strategy of the adopted Local Plan.</p> <p>Concerned Table 4.1 includes sites intended for allocation, many of which have planning permission. No need to allocate sites where they are under construction as they clearly no longer require policy support to assist their delivery.</p> <p>Suggests Table 4.1 should be updated to show the overall requirement for each settlement, based on the percentages set out at Table 8.1 of the Local Plan Strategy. Sites that have been completed or under construction should be added to completions or commitments figures and not be included as proposed allocations and the capacity of several proposed allocations need to be revisited.</p> <p>Paragraph 1.10, Pg 7 and Paragraphs 4.7-4.8, Page 15: Important the LPAs document explicitly commit the Council to submit a replacement or revised Local Plan for examination by January 2020 and to incorporate an appropriate contribution towards Birmingham's housing needs. There needs to be a policy commitment to undertake a Green Belt and Local Plan Review by 2020.</p> <p>Housing Land Supply - Urban Capacity Assessment concludes additional sites beyond the existing settlement boundaries are required to ensure the delivery of the housing requirement and to realise the spatial development strategy established through the Local Plan Strategy. There are a significant number of proposed allocations where there is evidence to demonstrate undeliverability, or that a reduced yield should be assumed. The proposed allocations should be reassessed and sites should be removed as proposed allocations or their potential contribution to the supply reduced accordingly. SDAs are running behind the timescales for delivering homes as originally set out in the LPS and therefore it will be necessary to allocate additional sites to plug any gaps in the housing trajectory and to ensure a rolling five year supply</p> |
| LPA 310 | Neil Cox (Pegasus) on behalf of Clearwater Properties | Local Plan Allocations Document | Yes | Yes | Yes |     | Yes | <p>Supports the allocation of Site B4: Land at Mount Road/ New Road for approximately 95 dwellings. LDC is justified in removing the site from the employment land portfolio. Mount Road Industrial Estate scored the lowest of all existing employment estates within the District for its role and importance in the Employment Land Review. Condition of buildings on the estate are of low quality; general external environment is of poor quality; number of buildings are unsuitable for continued employment use; vacancy rates on the estate are high.</p> <p>In the SHLAA the site is identified as suitable, available and achievable. It is also subject to a live outline planning application. The site is brownfield land which comprises of a number of commercial buildings that have been vacant for a number of years.</p> <p>The allocations document contains an updated housing trajectory at Appendix D, however no site specific information has been published alongside to allow for interrogation of the trajectory.</p>  |
| LPA 311 | Neil Cox (Pegasus) on behalf of Drayton Manor Park    | Chapter 5                       |     |     | No  | Yes | Yes | <p>Drayton Manor Park is currently covered by Policy Emp.5: Major Developed Sites in the Green Belt of the Saved Local Plan which is due to be deleted. Saved Policy Emp.5 is no longer consistent with national policy and requires reviewing in the context of the Local Plan Allocations document.</p> <p>Seeking continued protection from the full effect of national and Development Green Belt policy through the inclusion of a specific policy allocation within the Local Plan Allocations document to facilitate long term sustainable development and growth at Drayton Manor.</p> <p>Vision Document submitted in support of representation to provide an overview of long term development proposals for the Park along with a phasing plan and envisaged timescales for their delivery. It is estimated that future planned growth at the Park could see visitor spend increase by around £13 million per annum.</p> <p>The Local Plan Allocations document does not make any reference to Drayton Manor Park nor does it propose to replace Policy Emp.5 with a suitable alternative that is in line with currently policy. If the Allocations document was to be adopted deleting saved policy Emp.5 with no credible alternative the whole of Drayton Manor Park would become subject to full weight of Green Belt policy. This could have significant detrimental economic impacts to the District and neighbouring LPAs.</p> <p>Allocating land at Drayton Manor Park provides an opportunity for a SPD to be prepared which could take the form of masterplan and development strategy.</p> <p>Argue Drayton Manor Park should be considered within Chapter 5 of the Local Plan Allocations.</p> <p>No assessment of Drayton Manor Park is included within the Green Belt Report 2012. Landscape and Visual Statement is submitted in support the representation.</p> <p>Provides comparison to Staffordshire Moorlands DC policy approach to Alton Towers and Wyre Forest District Council approach to West Midlands Safari &amp; Leisure Park. Seeks a similar policy allocation for Drayton Manor as afforded to West Midlands Safari Park as this would provide an opportunity to produce a SPD for the Park's long term growth. Provides potential policy wording relating to development within</p>   |

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| LPA 312 | Neil Cox (Pegasus) on behalf of Richborough Estates      | Local Plan Allocations | Yes | Yes | No | Yes | Yes | <p>Supportive of the approach that LDC have taken and the Allocations Document has taken a robust and well considered approach to site selection and Green Belt release within Whittington.</p> <p>The timing of the LDC Local Plan review should be brought forward and shouldn't be constrained by the timing of other emerging plans.</p> <p>Urban Capacity Assessment contains many inconsistencies with the approach taken and calculations within it. Many of the allocations within the Allocation document are already under construction and therefore should be recategorised as commitments or completions. A number of the allocations within the Allocations document are not deliverable or developable and therefore shouldn't be identified as allocations. As a result of this to maintain a buffer of supply, additional sites should be identified that are deliverable particularly where there is a heavy reliance on brownfield and strategic sites.</p> <p>Supporting document covers site issues such as sustainability, highways, infrastructure, landscape, environment, heritage, flooding and development options</p>   |
| LPA 313 | Mark Dauncey (Pegasus) on behalf of Wetenhall Properties | Local Plan Allocations | Yes | Yes | No | Yes | Yes | <p>Promoting land off London Road (SHLAA Ref: 955) as a sustainable location to meet the growth needs of Lichfield City.</p> <p>Paragraph 1.3 suggests the remit of the Local Plan Allocations document is to deliver growth requirements in accordance with the LPS rather than establish a new distribution strategy as appears to be the case. The growth strategy contained in the LPS has been scrutinised and found to be most sustainable option for delivering growth across the District, concerned the apportionment set out at Table 4.1 of LPA document does not appear to have been tested within the most recent Sustainability Appraisal. The spatial distribution should remain consistent with the Local Plan Strategy, unless an alternative approach, with evidence to support it is prepared to fully justify it. The figures set out in Table 4.1 appear to be led by decisions already made rather than an attempt to deliver growth strategy of the adopted Local Plan. Concerned Table 4.1 includes sites intended for allocation, many of which have planning permission. No need to allocate sites where they are under construction as they clearly no longer require policy support to assist their delivery. Suggests Table 4.1 should be updated to show the overall requirement for each settlement, based on the percentages set out at Table 8.1 of the Local Plan Strategy. Sites that have been completed or under construction should be added to completions or commitments figures and not be included as proposed allocations and the capacity of several proposed allocations need to be revisited.</p> <p>Paragraph 1.10, Pg 7 and Paragraphs 4.7-4.8, Page 15: Important the LPAs document explicitly commit the Council to submit a replacement or revised Local Plan for examination by January 2020 and to incorporate an appropriate contribution towards Birmingham's housing needs. There needs to be a policy commitment to undertake a Green Belt and Local Plan Review by 2020.</p> <p>Housing Land Supply - Urban Capacity Assessment concludes additional sites beyond the existing settlement boundaries are required to ensure the delivery of the housing requirement and to realise the spatial development strategy established through the Local Plan Strategy. There are a significant number of proposed allocations where there is evidence to demonstrate undeliverability, or that a reduced yield should be assumed. The proposed allocations should be reassessed and sites should be removed as proposed allocations or their potential contribution to the supply reduced accordingly. To maintain a buffer of supply, additional sites should be identified that are deliverable such as land off London Road, Lichfield.</p> <p>Provides supporting technical documents in relation to land off London Road including an Ecological Appraisal, Transport Appraisal and Landscape and Visual Impacts Appraisal. Confirms site is suitable, available and achievable for development.</p> |
| LPA 314 | Louise Whinnet (Pegasus) on behalf of Acre Architects    | Local Plan Allocations |     |     | No | Yes | Yes | <p>Promotes land off Court Drive, Shenstone for approximately 100 dwellings.</p> <p>Consider that Part II of the Local Plan should respond positively to housing shortfall across the HMA in order to meet the test of soundness. The Local Plan Allocation needs to state a clear commitment to an early Plan Review, identify suitable sites as Safeguarded Land and as a minimum plan for the delivery of at least the minimum amount identified within the Local Plan Strategy and a 20% buffer should be applied.</p> <p>Assesses how Sites S1, S2 and S3 in Shenstone fail to satisfy the tests of soundness, particularly in respect of deliverability. Site S1 - large proportion of the site is located within FZ2 and FZ3, insufficient information available to understand why this site is the most appropriate location when assessed against alternatives. Local Plan Strategy identifies the site for employment and seeks to guide development away from areas of flood risk. Site S2 - Site is Green Belt, Fotherley Brook forms the eastern boundary of the site, therefore south east of site falls within FZ2 and FZ3 and the site is located within close proximity of two identified Biodiversity Alert Sites. Site S3 - close proximity to FZ2 and FZ3 located to north of the site. The Open Space Assessment identifies this area of land as 'amenity greenspace' within Shenstone and Policy HSC1 seeks to protect such land. Site is identified on SCC mapping system as Common Lane.</p> <p>Provides supporting technical documents in relation to land off Court Drive including an FRA, Landscape and Visual Statement and Green Belt Analysis and indicative masterplan. Provides an assessment of the SA.</p>   |



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| LPA 315 | Neil Cox (Pegasus) on behalf of Richborough Estates                      | Local Plan Allocations Document            | No  | Yes | No        | Yes | Yes | <p>Proposes a site at land off Plantation Lane, Bonehill for Green Belt release to meet the housing requirements for the Plan period in Fazeley, Bonehill and Mile Oak (2.34ha net developable area).</p> <p>There are clear difficulties with a number of brownfield and infill sites within the settlement boundary that cannot be relied upon (Tolsons Mill - lapsed planning permission). Therefore more Green Belt release should be considered as a result of the difficulties in the delivery of the North of Tamworth BDL.</p> <p>In the Supplementary Green Belt Report 2016 the parcel that the proposed site is within the lower section of Parcel Fazeley 4. The southern part of Parcel Fazeley 4 had a lesser impact on the role of Green Belt than the other surrounding parcels (excluding Parcel Fazeley 2).</p> <p>Local Plan should be replaced or reviewed by January 2020 to incorporate an appropriate contribution to unmet needs of the GBHMA. Tamworth's remaining unmet need (825 dwellings between Warwickshire and LDC) needs to be addressed within the Allocations Document.</p> <p>Housing trajectory at Appendix D has no site specific information to allow for interrogation.</p>  |
| LPA 316 | Rachel Jones (How planning) on behalf of Grasscroft Homes & Property Ltd | Policy F1: Fradley Housing Allocations     | No  | Yes | No        | Yes | Yes | <p>Promotes land at Hay End Lane in Fradley as a sustainable location that offers an opportunity for allocation for housing development.</p> <p>References to the Urban Capacity Assessment 2016 and the SHLAA to highlight that the Council accept outline planning permissions and SDA sites in Fradley are likely to under deliver and further sites should be allocated to accommodate this.</p> <p>Lichfield will need to accommodate a portion of Birmingham's shortfall. Whilst it is clear from the Local Plan Allocations document that the Council is committing to a Local Plan review to address the housing requirements of the GBHMA, the Council should plan to meet its housing needs, including a contribution towards the needs of the GBHMA now. To achieve this, additional sites should be identified for housing allocations in the LPA document to address this shortfall. If the Council does not plan to contribute towards the GBHMA need now then a Local Plan Review mechanism needs to be clear as to when this review will take place.</p> <p>With regards to 5 year housing land supply, the Council currently use the Liverpool method, should the Council adopt the Sedgefield approach, HOW calculated the Council's currently land supply to be in the region of 4.31 years (20% buffer) or 4.65 (5% buffer).</p> <p>Policy F1 allocates Bridge Farm for 80 units. Compares Paragraph 12.2 and Urban Capacity Statement. UCS states that there is anecdotal evidence that certain parts of the SDA may not be built out to the upper limit of the outline permissions, therefore additional sites in Fradley need to be allocated.</p> <p>Land at Hay End Lane is a sustainable site and can deliver 54 dwellings. Outlines the key economic, social and environmental benefits associated with development at this site. Supporting technical studies submitted including a landscape appraisal and Phase 1 Habitat Survey. Confirms the site is available, suitable and achievable for development.</p> |
| LPA 317 | Liz Boden (Pegasus) on behalf of C Zero Developments Ltd                 | Policy W1: Whittington Housing Allocations | Yes | Yes | No (NPPF) | Yes | No  | <p>Supports the inclusion of land west of Common Lane, Whittington as an allocation site. Exceptional circumstances to justify the Green Belt release have been demonstrated through housing needs and lack of affordability in the rural area. Site is promoted as 10 custom/ self build units.</p> <p>In the Sustainability Appraisal the site scored a single positive for close proximity to key services when it is contended that the actual scoring should be a double positive due to ease of access (including pedestrian) to amenities and facilities.</p> <p>The site also scores a single positive for location encouraging the use of existing sustainable modes of transport which again is contended as the site is adjacent to a bus stop and should therefore be a double positive.</p> <p>The Sustainability Appraisal's assessment of the sites contribution to a number of ecological sustainability objectives is a single negative however evidence from supporting documents suggest it should be scored as a neutral effect or minor positive effect on sustainability objective. Similar can be said of Objective 4 and 10 in that they should be neutral or minor positive scoring rather than single negative.</p> <p>The site is promoted as custom/ self build, the only multi-plot site proposed for custom build in the District, therefore the only opportunity for LDC to demonstrate compliance with Private Housebuilding legislation and policy. Private Housebuilding has not been considered through the LPS or the Allocations Document therefore it does not comply with paragraphs 50 and 159 of the NPPF.</p> <p>There is currently a shortage of self build plots in the District, LDC should work with the client to try to balance entitlement to a plot with plot opportunities. To make the Allocations document fully sound inclusion of policy support for custom/ self build dwellings; bringing it in line with Government guidance and in accordance with the NPPF.</p>                  |

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| LPA 318 | Neil Cox (Pegasus) on behalf of Persimmon Homes | Local Plan Allocations Document                | Yes | Yes | No (justified and effective) | Yes | Yes | <p>Representation relates to the South of Lichfield SDA which is within the control of Persimmon Homes.</p> <p>Supports that the Local Plan Allocation document does not propose to amend within the LPS policies which impact the Spatial Strategy or the SDA that relates to the St John's site within the South of Lichfield SDA.</p> <p>The Plan provides a commitment to undertake a review of the Local Plan to address shortfall within the GBHMA. This commitment is supported but needs to provide further clarity and certainty relating to the date by which a MOU to deal with the distribution of growth and unmet need of GBHMA will be signed and the date for adopted of an updated Local Plan. The Council should submit a replacement or revised Local Plan for examination by January 2020 in line with the Birmingham Development Plan.</p> <p>Confirms the S106 in respect of the South of Lichfield SDA is expected to be signed imminently. Provide a likely trajectory within the SDA which shows 25 units being delivered in 2017/2018 and the site being built out by 2023/2024.</p> <p>Support the Urban Capacity Assessment 2016 conclusion that completions, commitments and additional capacity on uncommitted sites within the existing urban area are not sufficient to meet the established 3,900 dwelling requirement. Question the purpose of allocating non-strategic sites that are already committed with detailed planning and are under construction.</p> <p>Policy ST3 (Road Line Safeguarding) proposed protection for the route of the Tamworth Road / London Road junction and Birmingham Road. The route of the proposed road between London Road / Tamworth Road and the Cross-City railway line will be secured through planning permission for the St John's scheme.</p> <p>As drafted Policy ST4 is not effective as it seeks to protect the land required to deliver road and junction improvements but the Policies Map fails to identify the necessary land. Question whether this policy is necessary as a number of junction improvements related to South of Lichfield SDA will be secured through planning condition and as all land required for delivery of the road and junction improvements is within the existing public highway there appears to be no justification for securing any additional policy protection</p> |
| LPA 319 | Jason Carwood                                   | Site W1: Land at Huddlesford Lane, Whittington |     |     |                              |     |     | <p>Opposes the allocation of Site W1: Land at Huddlesford.</p> <p>Encroachment of development: Site W1 continues the function of the adjacent allotments and recreation area in the role as Green Belt land of safeguarding the countryside from encroachment. Green Belt Review 2012 and supplement 2013 give this site an overall 'important' status as a reflect of its role as Green Belt land. Core Policy 6 states the only development that will be permitted for rural areas is small scale development, does not consider W1 identified for 60 dwellings as small scale development.</p> <p>Openness: Site W1 is a notable approach to the village. The impact of inappropriate development, such as housing, would cause significant harm to the openness of this approach to the village. Compares to Site W4 and SHLAA Ref: 748 which are well screened from the highway and argues the contribution these sites make to openness is moderate or less than moderate.</p> <p>Community Use: Footpath 10(a) passes through Site W1 and is a well-used connection between the North and West quarters of the village, particularly for people walking their dogs.</p> <p>Local Infrastructure &amp; Services: Impact the development will have on local services, particularly Doctors Surgery and local primary school which is already oversubscribed.</p> <p>Highways: Highlights difficulties in achieving safe access and states development of Site W1 would significantly increase congestion and be contrary to policy T &amp; M1 of the emerging Neighbourhood Plan.</p>  |
| LPA 320 | Susan Broughton                                 | Site S2 (Shenstone)                            | No  | No  | No                           | Yes | No  | <p>The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building</p>  |
| LPA 321 | Susan Broughton                                 | Site S3 (Shenstone)                            | No  | No  | No                           | Yes | No  | <p>Objects to the development at site S3 due to LDC previously accepting that the site was not suitable for new house building as part of Shenstone's Neighbourhood Plan. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014. LDC have failed in DfC duties as they have not ensured evidence is locally derived and failed to consider an approved Neighbourhood Plan</p>   |

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| LPA 322 | Neil Cox (Pegasus) on behalf of St Modwen Developments Ltd and Persimmon Homes | Local Plan Allocations Document | Yes | Yes | No (justified and effective) | Yes | Yes | <p>Cricket Land SDA is in control of St Modwen and Persimmon Homes who are in the process of preparing a planning application to be submitted to LDC later this year. They support the continued recognition of the importance of SDA's in delivering homes, jobs and supporting infrastructure.</p> <p>The emerging scheme at Cricket Lane assumes the majority of employment floorspace will be provided within B8 and B1c/B2 uses.</p> <p>Local Plan should be replaced or reviewed by January 2020 to incorporate an appropriate contribution to unmet needs of the GBHMA. Tamworth's remaining unmet need (825 dwellings between Warwickshire and LDC) needs to be addressed within the Allocations Document. Commitment should be included in a specific policy in Chapter 4 to ensure the Local Plan is sound.</p> <p>Housing trajectory at Appendix D has no site specific information to allow for interrogation.</p> <p>Sites L3, L4, L11, L13, L15, L28 are non-strategic sites that are committed and are under construction, they should be removed from the Allocations document and Table 4.1 updated accordingly.</p> <p>Policy ST4 seeks to protect land required to deliver these roads and junction improvements, however the Policies Maps fail to identify the land. As the land required is within existing public highway land there is no justification for securing additional policy protection.</p>   |
| LPA 323 | Jane Field on behalf of Environment Agency                                     | Local Plan Allocations Document |     |     |                              |     |     | <p>Level 1 SFRA was updated in 2014 to take into account new model data, however does not take account of the revised climate guidance issues in 2016 which requires a greater allowance to be made than the 20% used within the SFRA. Do not necessarily need to update this to support the site allocation documents but recommend providing a brief addendum in order to clarify how applicants should consider flood risk issues when undertaking flood risk assessments. Seek to address implications of the increase in climate change allowances on the site allocations when carrying out a Level 2 SFRA.</p> <p>Sites Rugeley 1, Alrewas 2, Shenstone 1, Shenstone 2, Other Rural 3 and Other Rural 5 fall within the floodplain and if they are to be carried forward as an adopted allocation need to be sequentially tested using the mapped outputs of the Level 1 SFRA. Should any of the sites pass the Sequential Test and progress towards submission they will need to be supported by a Level 2 SFRA.</p> <p>Sites L2, L5, L6, L29, B14, NT1 and F2 may be affected by flooding from an Ordinary watercourse. Recommend SCC as LLFA advise on how any risk should be managed.</p> <p>Lichfield Canal: Concerned with wording with the IDP as it appears to discourage infiltration based SuDS techniques in favour of discharging surface waters into the canal as a water source. Recommend wording of draft Policy IP2 and supporting IDP are amended to bring in line with adopted CP3 and paragraph 2.2 should be amended.</p> <p>Groundwater Protection: Recommends sites that are located within Source Protection Zones 1 and 2 includes some reference to adopted Policy CP3 which acknowledges the risks to groundwater in these areas.</p> <p>IDP: Recommend Page 22 headed Water Resource Infrastructure Needs is amended to Water abstraction and impoundment and reference to Lock 26 be removed.</p> <p>Water Cycle Study: Discussions should take place with South Staffs Water to determine whether there are any implications of the Water Resources Management Plan for the recommendations of the WCS.</p> <p>Sustainability Appraisal: SA does not address the issues of the flood risk Sequential Test. Recommend the following sites Alrewas 28, Other Representation relates to Land at Hay End Lane, Fradley, which is in the control of Wilson Bowden developments. Analysis of the site can be found in the background document submitted with representations.</p> |
| LPA 324 | David Onions (Pegasus) on behalf of Wilson Bowden Developments                 | Local Plan Allocations Document | Yes | Yes | No                           | Yes | No  | <p>It is considered that the Local Plan does not go far enough to address the GBHMA. To help address the Birmingham overspill LDC should allocate further housing allocations in the Allocations document. This could include Land at Hay End Lane, Fradley which is well placed to meet the future housing needs of the area.</p> <p>Only one housing allocation for Fradley at Bridge Farm, which has outline planning permission for up to 80 dwellings, despite being a key centre for growth. The site is highly sustainable as 18.2ha of employment land has been allocated in Fradley. Failure to allocate further housing in Fradley could lead to unsustainable patterns of development and commuting. Allocating the proposed site would provide greater flexibility in the Local Plan which is necessary to deliver future housing needs.</p> <p>A number of allocated sites are already under construction or are completed, these should be recategorised within the Allocations document and the site allocation figures revised accordingly.</p> <p>Recommends that LDC's allowance of 55 dwellings per annum for windfalls is removed for the first 3 years of the total supply as they are already accounted for in the identification of supply.</p> <p>LDC are experiencing a delay in delivering homes as a result of the SDA's running behind the timescales set in the LPS. The Housing trajectory at Appendix D has no site specific information to allow for detailed commentary.</p>  |

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| LPA 325 | Neil Cox (Pegasus) on behalf of Miller Homes Ltd            | Local Plan Allocations Document | Yes | Yes | No | Yes | Yes | <p>Representation relates to land at Streethay (Phase 2) which is in control of Miller Homes Ltd.</p> <p>The Plan provides a commitment to undertake a review of the Local Plan to address shortfall within the GBHMA. This commitment is supported but needs to provide further clarity and certainty relating to the date by which a MOU to deal with the distribution of growth and unmet need of GBHMA will be signed and the date for adopted of an updated Local Plan. The Council should submit a replacement or revised Local Plan for examination by January 2020 in line with the Birmingham Development Plan.</p> <p>Housing delivery has not been realised as originally intended in the Local Plan Strategy, the deficit has not been addressed through alternative sites coming forward to take up any shortfall and the LPS made no provision for such an occurrence. Miller Homes welcomes the inclusion of an updated housing trajectory contained within Appendix D however no site specific information has been published. The updated trajectory reflects poor delivery performance experienced within the Plan period to date particularly the delay in delivering the SDAs. Good progress has been made on the East of Lichfield (Streethay SDA). Confirms the likely trajectory within this SDA is 100 units in 17/18 with the development being built out by 2022/2023.</p> <p>Disagree with the Urban Capacity Assessment 2016 conclusion that at Stage 1 the LPA document needs to make further provision for a minimum of 1,825 dwellings of which 789 need to be focused towards Lichfield City. UCS contains inconsistencies and problems with the approach taken and the calculations within it, many of allocations are already under construction and should not be identified as new allocations, many of the allocations are not deliverable or developable, once those sites not deliverable or developable are removed there will be a deficit across the District against the housing target and on this basis additional sites should be allocated to maintain a buffer.</p> <p>Supports Urban Capacity Assessment conclusion that completions, commitments and additional capacity on uncommitted sites within the existing urban area are not sufficient to meet the established 3,900 dwelling requirement. It is necessary to look beyond the existing urban area around Lichfield City.</p> <p>Supports the proposed extension to East of Lichfield SDA (Site L2).</p> <p>Unclear whether proposed extension to the SDA are intended to form part of the urban area of Lichfield City or whether it should be included</p>           |
| LPA 326 | Michelle Simpson-Gallego (Pegasus) on behalf of Bloor Homes | Local Plan Allocations Document | Yes | Yes | No | Yes | Yes | <p>Representations relate to land to the east of Coulter Lane, Burntwood which is within the control of Bloor Homes and submit promotional document in support of the allocation.</p> <p>The Plan provides a commitment to undertake a review of the Local Plan to address shortfall within the GBHMA. This commitment is supported but needs to provide further clarity and certainty relating to the date by which a MOU to deal with the distribution of growth and unmet need of GBHMA will be signed and the date for adopted of an updated Local Plan. The Council should submit a replacement or revised Local Plan for examination by January 2020 in line with the Birmingham Development Plan.</p> <p>Housing delivery has not been realised as originally intended in the Local Plan Strategy. The deficit has not been addressed through alternative sites coming forward to take up any shortfall. Whilst the Council has updated its housing trajectory, no site specific information has been published. Good progress has been made in the delivery of the Land East of Burntwood Bypass SDA, however there is shortfall of 30 units against the assumed yield set out in the LPS.</p> <p>Supportive of undertaking an Urban Capacity Assessment to illustrate the finite brownfield capacity that is present within the existing urban area. Argue that the total supply for Burntwood should be reduced from 1,035 to 1,009 dwellings. UCS contains inconsistencies and problems with the approach taken and the calculations within it, many of allocations are already under construction and should not be identified as new allocations, many of the allocations are not deliverable or developable, once those sites not deliverable or developable are removed there will be a deficit across the District against the housing target and on this basis additional sites should be allocated to maintain a buffer.</p> <p>Welcome the preparation of the Local Plan Allocations Supplementary Green Belt Report 2016. It provides an assessment of parcels at the Former St Matthews Hospital and justifies a revised Green Belt boundary to integrate St Matthews into the wider settlement of Burntwood. There is a requirement to consider the issue of safeguarded land now through the Local Plan Allocations document rather than push it to a future review.</p> <p>Pegasus submitted supporting Landscape and Visual Constraints and Opportunities report which endorses many of the conclusions contained within the Council's evidence base and establishes the site does not perform an important role in respect of Green Belt purposes.</p> |

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| LPA 327 | Michelle Simpson-Gallego (Pegasus) on behalf of Bloor Homes                      | Local Plan Allocations Document | Yes | Yes | No | Yes | Yes | <p>Representations relate to land to the west of Coulter Lane, Burntwood which is within the control of Bloor Homes and submit promotional document and evidence in support of the safeguarding of this site which can deliver approx 400 dwellings.</p> <p>The Plan provides a commitment to undertake a review of the Local Plan to address shortfall within the GBHMA. This commitment is supported but needs to provide further clarity and certainty relating to the date by which a MOU to deal with the distribution of growth and unmet need of GBHMA will be signed and the date for adopted of an updated Local Plan. The Council should submit a replacement or revised Local Plan for examination by January 2020 in line with the Birmingham Development Plan.</p> <p>Housing delivery has not been realised as originally intended in the Local Plan Strategy. The deficit has not been addressed through alternative sites coming forward to take up any shortfall. Whilst the Council has updated its housing trajectory, no site specific information has been published. Good progress has been made in the delivery of the Land East of Burntwood Bypass SDA, however there is shortfall of 30 units against the assumed yield set out in the LPS. Bloor Homes considers further land should be identified for development within Burntwood to ensure the Local Plan is effective in ensuring that the housing requirement of 1,350 for the settlement can be delivered.</p> <p>The issue of safeguarded land was considered through the examination of the LPS. As the issue of safeguarded land was not dealt with through the LPS there is a requirement to consider this issue now through the Allocations documents rather than push this to a future review.</p> <p>Submit a Landscape and Visual Constraints and Opportunities report to complement to Councils Green Belt evidence base.</p> <p>Land to the west of Coulter Lane provides a sound option for assisting in delivering homes in the longer term and should be safeguarded to meet longer term housing requirements which are to be considered through the forthcoming Local Plan review.</p> <p>Provides summary on Burntwood Allocations and highlights issues with a number of the allocations, some of which are already advanced and have been completed and other are showing no certainty of being delivered.</p> <p>Comments on the Green Belt Review, SHLAA and SA relating to Coulter Lane. Confirms land west of Coulter Lane is a suitable and sustainable location for residential development and represents a deliverable proposition, being available now and providing every prospect that a significant number of dwellings can be delivered.</p> |
| LPA 328 | Stacey Green (Barton Willmore) on behalf of the Church Commissioners for England | Local Plan Allocations Document |     |     |    |     |     | <p>Representation relates to land at the west of Ironside Road and west of Stables Way, Burntwood. The site is Green Belt, suitable for 375 dwellings and is situated between existing built edge of Burntwood and the boundary with Cannock Chase District and the Chasewater SSSI. The site has not been included in the Green Belt Review, Supplementary Report 2013 or the LPA Supplementary Green Belt Report 2016. Unreasonable for LDC to propose allocations at Burntwood in the Green Belt without due consideration for sites adjacent to the urban area.</p> <p>Lichfield District are aware of the need to assist Birmingham City Council in meeting their unmet housing needs, it is considered that some additional non-strategic sites should be identified now to ensure that the housing need of the wider HMA is met.</p> <p>Barton Willmore have undertaken a Green Belt assessment which is submitted as part of a supporting document. The southern part of the site has been assessed by Barton Willmore as providing a "limited contribution" to the purposes of the Green Belt and the northern part a "some to a limited contribution". Parcel B14 is assessed as contributing "some to a limited contribution" and Parcel B15 contributes "some to a little" to the purposes of the Green Belt.</p> <p>Concerns regarding how the cumulative supply of 11,191 in Table 4.1 has been calculated. Consider a 10% demolition / non-implementation buffer should be applied to committed supply, non-strategic allocations and windfall allowance, and it should also be applied to strategic allocations. The windfall allowance should not be included for the next three years to avoid double counting. Paragraph 47 of NPPF requires LPAS to significantly boost the supply of housing. It is not considered the Allocations Document does this and additional land should be allocated such as land west of Ironstone Road and west of Stables Way to ensure flexibility.</p> <p>Over reliance on brownfield sites which is considered to be slow to deliver and can have many barriers to redevelopment. LDC is encouraged to safeguard land adjacent to the urban area of Burntwood to help promote sustainable patterns of growth.</p>   |

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| LPA 329 | Gemma Johnson (Barton Willmore) on behalf of Sarah Milward (IM Land) | Local Plan Allocations Document |    |    | No | Yes | Yes | <p>Promoting land to the north of Lichfield for residential development of approximately 200 dwellings.</p> <p>Lichfield District are aware of the need to assist Birmingham City Council in meeting their unmet housing needs, it is considered that some additional non-strategic sites should be identified now to ensure that the housing need of the wider HMA is met.</p> <p>Concerns regarding how the cumulative supply of 11,191 in Table 4.1 has been calculated. Consider a 10% demolition / non-implementation buffer should be applied to committed supply, non-strategic allocations and windfall allowance, and it should also be applied to strategic allocations. The windfall allowance should not be included for the next three years to avoid double counting. Paragraph 47 of NPPF requires LPAS to significantly boost the supply of housing. It is not considered the Allocations Document does this and additional land should be allocated such as land at North Lichfield to ensure sufficient flexibility within the Plan.</p> <p>Local Plan Allocations proposes to review the Green Belt to accommodate additional residential allocations. It is not considered that the Council have examined fully reasonable options for meeting their housing requirements outside of the Green Belt. Land to the north of Lichfield is outside of Green Belt and is capable of accommodating approximately 200 dwellings.</p> <p>Considered all reasonable alternatives to Green Belt release should be considered prior to the release of Green Belt land. Additional allocations should be made to boost the supply of housing and provide flexibility.</p> <p>Promotes land at North Lichfield, confirms there are no constraints and the site is in a sustainable location for development. Submits supporting promotional document, transport and flood risk note and landscape capacity assessment.</p> |
| LPA 330 | Dennis Pollard representative of residents of St Matthews Estate     | Policy B1& Paragraph 14         |    |    |    |     | Yes | <p>120 signed copies of letter received from residents of St Matthews Estate objecting to the proposal to remove the estate from the Green Belt.</p> <p>Request to participate at EIP to explain how many residents have only just become aware of the proposal and see it as a threat to the surrounding green belt, movement of traffic in the area, availability of school places and ability to access medical facilities.</p> <p>Object to remove St Matthews from the Green Belt as out in Policy Burntwood 1: Burntwood Environment and accommodate residential allocations (Site B15) to assist in meeting the housing requirement for Burntwood.</p> <p>Consider Paragraph 14 'integration of this area with the town would be beneficial in allowing the St Matthews Estate to function as part of the larger urban area' as meaningless nonsense as St Matthews estate has functioned well for the past 18 years and being in the Green Belt has never been a barrier to changes to properties. This is a ploy to justify the removal of adjacent land from the Green Belt</p>   |
| LPA 331 | Generic Green Belt Petition  | Section 9: Burntwood            |    |    |    |     |     | I/we the undersigned call on Lichfield District Council to protect the Green Belt and ensure that housing development primarily takes place on Brownfield sites across the District. Signed by 37 people.   |
| LPA 332 | Burntwood & Hammerwich Labour Party Petition                         | Section 9: Burntwood            |    |    |    |     |     | Please find enclosed a petition of 94 signatures and survey responses from 60 residents opposing the loss of Green Belt to housing development.   |
| LPA 333 | Stephen Fairweather  | 12.14 - 12.16                   | No | No | No | Yes | No  | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building   |

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| LPA 334 | Stephen Fairweather                               | Site S3 (Shenstone)                       | No | No | No | Yes | No | Objects to the development at site S3 due to LDC previously accepting that the site was not suitable for new house building as part of Shenstone's Neighbourhood Plan. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014. LDC have failed in DtC duties as the have not ensured evidence is locally derived and failed to consider an approved Neighbourhood Plan   |
| LPA 337 | Mrs Pauline Boss                                  | Site S3 (Shenstone)                       | No | No | No | Yes | No | Objects to the development at site S3 due to LDC previously accepting that the site was not suitable for new house building as part of Shenstone's Neighbourhood Plan. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014. LDC have failed in DtC duties as the have not ensured evidence is locally derived and failed to consider an approved Neighbourhood Plan   |
| LPA 338 | Mr Roy Parkes                                     | Site S3 (Shenstone)                       | No | No | No | Yes | No | Objects to the development at site S3 due to LDC previously accepting that the site was not suitable for new house building as part of Shenstone's Neighbourhood Plan. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014. LDC have failed in DtC duties as the have not ensured evidence is locally derived and failed to consider an approved Neighbourhood Plan   |
| LPA 339 | Mr Ian Tucker                                     | Site S3 (Shenstone)                       | No | No | No | Yes | No | Objects to the development at site S3 due to LDC previously accepting that the site was not suitable for new house building as part of Shenstone's Neighbourhood Plan. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014. LDC have failed in DtC duties as the have not ensured evidence is locally derived and failed to consider an approved Neighbourhood Plan   |
| LPA 340 | Mrs Louise Hearne                                 | Site S2 (Shenstone)                       | No | No | No | Yes | No | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building   |
| LPA 341 | J Hancox  | Policy B1, Site B14 & Site B15            |    |    |    |     |    | Objects to building on the Green Belt land surrounding Burntwood. Burntwood will on the one side sprawl further to becoming a suburb of Lichfield and on the other as far as Brownhills at the A5.<br><br>NPPF contains presumption in favour of sustainable development, sites in Green Belt on the periphery of Burntwood are not sustainable. Further expansion of the Burntwood boundary will exacerbate the situation regarding local of services and insufficient infrastructure.<br><br>Ask Council to consider carefully the real requirements of people struggling to buy a home and whether those needs could be better met by affordable development on brownfield sites.  |
| LPA 342 | JC and D Howells                                  | Other Rural Longdon                       |    |    |    |     |    | Suggest some areas for development should be identified within villages in order to maintain their viability and prevent them becoming old peoples' homes, losing schools, shops and post offices and transport services. Particularly concerned for the village of Longon.<br><br>Consider Longdon suitable for development as it has local services and facilities, good transport links, not blighted by HS2 and serves approximately 1750 residents. Longdon is viable as it has amenities which would be preserved and enhanced if further affordable housing was provided. Compares Longdon to Kings Bromley where since houses have been under construction a new shopping complex has been constructed and public house opened.   |
| LPA 343 | Cllr Susan Woodward on behalf of LDC Labour Group | Site B14 (Burntwood) Site B15 (Burntwood) |    |    |    |     |    | Opposes development within Green Belt, in particular sites B14 and B15.<br><br>Do not believe there is any justification for sites at Coulter Lane and Highfields Road to be considered as 'exceptional circumstances.'<br><br>Burntwood suffers from lack of infrastructure investment. Services have not followed development. Burntwood community is overwhelmingly opposed to any reduction of its valued Green Belt.<br><br>Do not believe all brownfield sites within the District have been considered or that evidence showing brownfield sites to be 'unsustainable' has not been provided or tested. Urge all brownfield sites to be thoroughly investigated before allocations are made on Green Belt.<br><br>Labour Group believe what is exception about these two sites is the controversy and opposition, including cross-Party opposition, that they have received.<br><br>Argue the impact of the proposals in Burntwood is disproportionate and totally unacceptable. There is no guarantee that any planning gain monies would address the current problems, let alone possible future problems.<br><br>Believe sites B14 and B15 would probably become commuter areas, adding little to the community life in the town while adding to the pressures on its services. |
| LPA 344 | Stephen Cowley                                    | Local Plan Allocations Document           | No | No | No | Yes | No | Local authorities need to work with the public. Documents need to be easily accessible and easy to understand.  |
| LPA 345 | John Turnbull                                     | Burntwood                                 |    |    |    |     |    | Quotes an article about Burntwoods infrastructure and services from 1977 and states Burntwood is still waiting for its provision of community facilities in 2017.<br><br>LDC without justification has decided Burntwood is a strategic direction for housing presuming it is sustainable. Questions where is the evidence to supports LDCs presumption.  |
| LPA 346 | A Leech   | Site B14                                  |    |    |    |     |    | Land south of Highfield Road is green belt land which is meant to be provide open space and green fields for the health and well being of local residents. This is an environmental issue invading the rights of the existing population to space and greenery. Objects to the development of another estate.   |

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| LPA 347 | Aurthur Grant    | Burntwood                                | No |  | No (justified and effective) | No | <p>The response form is a hinderance to members of the public. To answer some of the questions requires specialist knowledge.</p> <p>Signs BAG petition. Site B14 is last remaining 'buffer' between West Midlands conurbation and Burntwood and should be preserved. B14 is observed as area of green preservation when walking at Chasewater. To allow site B14 to become a housing development would blight the views from Chasewater and degrade its ability to refresh those who seek to enjoy the open spaces which are left.</p> <p>The infrastructure of Burntwood is inadequate now, without further increasing population.</p> |
| LPA 348 | J Davies         | Burntwood                                |    |  |                              |    | <p>The proposed development south of Highfields Road would effectively give a continuous housing development to either side of the toll road. Promises made at the time of the toll road construction regarding maintaining the Green belt have faded into insignificance.</p> <p>Coulter Lane is a pleasant area to walk in. Building to the east of the lane is going to remove the rural character and seems to be a prelude to 'developing' the fields between Coulter Lane and Rugeley Road. There is still brownfield land in Burntwood which could be built on why is there a need to build on Green Belt land.</p>               |
| LPA 349 | Alison Parr      | Site B14: Land south of Highfields Road  |    |  | No (effective)               |    | <p>The plans to build on the farmland off Highfields Road (250 homes) is totally inappropriate as local facilities cannot accommodate this development. The roads cannot support extra traffic.</p> <p>Continual expansion on the green belt areas is destroying the local countryside for good. The Council should look to more brownfield sites. It could be more appropriate to build a few complexes for elderly residents and free up some of the existing large dwellings for families.</p>  |
| LPA 350 | Anne Barter      | Burntwood                                |    |  | No (justified)               |    | <p>Opposes any building on green belt land in the Burntwood area. There is brown land which could be used and resources should be employed to identify and utilise these areas before any green belt area is considered for housing.</p>   |
| LPA 351 | Alan Bliss       | Site B15: Land east of Coulter Lane      |    |  |                              |    | <p>Supports Burntwood Action Group in their stance against proposals to construct houses on green belt land in and around Burntwood.</p> <p>Strongly opposes the allocation of land to the east of Coulter Lane and the impact this will have on services and infrastructure. Bloor Homes plan proposes a further 400 homes west of Coulter Lane and 80 homes to the east will set a precedent for further development.</p>  |
| LPA 352 | Wendy Taylor     | Site B14: Land south of Highfields Road  |    |  |                              |    | <p>Object strongly to the proposed housing off Highfields Road. The section of green belt is very narrow and much has already been lost with the construction of the M6 Toll. The remaining land is precious and should be protected from development. There is insufficient infrastructure for any more housing developments of this site.</p>  |
| LPA 353 | Brian Budley     | Site B14: Land south of Highfields Road  |    |  |                              |    | <p>Object to the proposed housing allocation at highfields Road within the Green Belt which is contrary to the NPPF. The District Councils Green Belt Review determined the area is narrow and too important to build on. Development will cause Burntwood to join up with the West Midlands. Councils can only release Green Belt in exceptional circumstances after all other options have been considered including brownfield sites. Infrastructure such as roads, schools and health facilities are overcrowded. Desecration of green belt is contrary to Conservative manifesto 2015.</p>  |
| LPA 354 | Frances McCallum | Policy B1: Burntwood Housing Allocations |    |  |                              |    | <p>Object to proposed development of Green Belt land around Burntwood. NPPF states that Green belt should only be developed under very special circumstances and does not believe that the circumstances are very special. Proposed site at Highfields Road will mean there is no definition between Brownhills and Burntwood. Once development has happened there is no going back. This is against public opinion.</p>   |
| LPA 355 | Jason Beeston    | Site B14: Land south of Highfields Road  |    |  |                              |    | <p>Objects to development on land South of Highfields Road. Concerned about the impact the development will have on traffic levels, air quality and local infrastructure. Notes that there is a stream which flows through the proposed site, which if developed, may heighten the risk of flooding.</p>   |
| LPA 356 | Maureen Tonks    | Local Plan Allocations                   |    |  |                              |    | <p>Consultation has been carried out without proper notification and further examination should be postponed until proper consultation is carried out. Access for proposed sites adjacent to Robert Peel hospital is not clear. Concerns over increased congestion in area. Level of social housing needs to be decreased and replaced with provision for elderly persons.</p>   |



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| LPA 357 | Sue Nelson - Parish Clerk - Shenstone Parish Council | Policy S1: Shenstone Housing Land Allocations, Page 83, Paragraph 12.14 to 12.16, Site 3: Land off Millbrook Drive. |  |  |  |  | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period . Outlines site specific issues and raises a concerns relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p><u>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building</u></p> |
| LPA 358 | A V Vayro  | Site B14: Land south of Highfields Road   |  |  |  |  | <p>Object to proposals to remove land from the Green Belt in Chasetown and Burntwood when facilities and infrastrucutre cannot support the existing residents.</p> <p>Loss of Green Belt at Chasetown would go against long term policy of Lichfield District Council. Area of Green Belt is important to prevent coalescence of Burntwood and the West Midlands conurbation.</p> <p>Facilities and infrastructure are insufficient - particularly health, employment, public transport, roads, shopping, leisure and library.</p> <p>The area is becoming saturated with high density housing.</p> <p>When housing allocations were considered 5 years ago the District Council reconsidered in the face of public opposition. There are further brownfield sites which should be considered such as Mount Road, Chase Terrace abattoir.</p>   |
| LPA 359 | Brian & Judy Duffy                                   | Site B14: Land south of Highfields Road   |  |  |  |  | <p>Object to the building of houses on Green Belt land at Highfields Road. It is the onlt Green Belt between Staffordshire and the West Midlands. There are alternative sites that are not Green Belt or would not cause the conurbation and Burntwood to link. The Government have pledged to protect the Green Belt and there are not exceptional circumstances to change the Green Belt.</p> <p>Access and egress for new residents would be difficult and cause further traffic issues. There are flooding issues in the area known locally as 'The Triangle'. Currently facilities and infrastrucutre are inadequate.</p>  |
| LPA 360 | Ian & Jean Hopkins                                   | Policy B1: Burntwood Housing Allocations  |  |  |  |  | <p>Priority for location of new housing should be brownfield sites to preserve the Green Belt and bring back into use derelict sites. For example the blue hoarding site. There should be an increase in the number of 1 and 2 bedroom dwellings. It is suggested that careful consideration be given to Burntwood Action Groups suggestions for development of the town and town centre. The District Council should consider the impact of development on schools and roads and should liase with the County Council and Burntwood Town Council. Bus services have deteriorated and would need improving following further development. The plan lacks community focus and there is a need for community facilities.</p>  |
| LPA 361 | Jane Smith   | Burntwood   |  |  |  |  | <p>Concerned developing in the Green Belt will change the character of Burntwood. Not against building new homes providing it is in the right places and will not result in the destruction of green open spaces. There is not just a problem with the amount of housing but an issue with the affordability and availability of social housing for people to rent at realistic prices.</p> <p>There has been a reduction in services and lack of investment in services and roads whilst the population has increased. It makes Burntwood and Hammerwick an increasingly unsustainable place to live.</p> <p>There is discrepancy between the proposals and NPPF as the proposals are not sustainable without significant investment in Burntwood and Hammerwich.</p> <p>Remain unconvinced that all other reasonable options have been examined and is under the impression there is reluctance to consider fully the possibility of alternative locations as the local plan as been written.</p> <p>Bloor Homes proposals focus on executive style housing rather than affordable housing.</p> <p>Supports the plan outlined by Burntwood Action Group to see bronwfield sites being used to meet housing requirements and the regeneration of Burntwood Town Centre and Health Centre facilities.</p>   |

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| LPA 362 | Emily Smith  | Burntwood  |  |  |  |  |  | <p>Concerned developing in the Green Belt will change the character of Burntwood. Not against building new homes providing it is in the right places and will not result in the destruction of green open spaces. There is not just a problem with the amount of housing but an issue with the affordability and availability of social housing for people to rent at realistic prices.</p> <p>There has been a reduction in services and lack of investment in services and roads whilst the population has increased. It makes Burntwood and Hammerwick an increasingly unsustainable place to live.</p> <p>There is discrepancy between the proposals and NPPF as the proposals are not sustainable without significant investment in Burntwood and Hammerwick.</p> <p>Remain unconvinced that all other reasonable options have been examined and is under the impression there is reluctance to consider fully the possibility of alternative locations as the local plan as been written.</p> <p>Bloor Homes proposals focus on executive style housing rather than affordable housing.</p> <p>Supports the plan outlined by Burntwood Action Group to see brownfield sites being used to meet housing requirements and the regeneration of Burntwood Town Centre and Health Centre facilities.</p>  |
| LPA363  | John Cannon on behalf of Whittington & Fisherwick Parish Council | Whittington, Site W1, Site W2, Site W3 and Site W4 |  |  |  |  |  | <p>Considers four sites identified for potential development and two other sites put forward in the Developers' Day forum held in Whittington which have been discounted.</p> <p>Site W1: Land at Huddlesford Lane - concerned Huddlesford Lane is narrow making access hazardous and impractical. Site boundaries defined by existing hedgerows is not obviously contiguous with existing village edge and development would impact on views. Indicative proposals from Richborough Estates show number of units have risen to 70 representing a net density of 38 dph.</p> <p>Site W2: Former Whittington Youth Centre - proposals developed by SCC retain existing school building. Proposals fit well with draft Neighbourhood Plan. However further consideration needs to given to the proposed mitigation measures at the site access.</p> <p>Site W3: Land at Chapel Lane &amp; Blacksmith Lane - Parish Council has considerable doubts at this juncture over the sites deliverability. There has been no indication that the current owner is prepared to sell the land. Site access is likely to be problematical.</p> <p>Site W4: Land west of Common Lane - although the site is favourably received, concerns expressed about likely impact on traffic outside Primary School during peak hours. Parish Council considered possibility of establishing self contained off road parking facilities for school and community uses. This could be backed by a suitably structured planning condition. Welcome the opportunity to discuss the aspect further with LDC officers.</p> <p>Site W5: Land east of Common Lane - not included within allocation proposals.</p> <p>Site W6: the presented scheme at Developers Day. As presented this scheme was arguably the best resolved amongst the 5 proposals, being well scaled and detailed appropriate to location, demonstrating more obvious continuity with adjacent existing development. Further clarification on the reasoning behind its omission at this stage would be helpful and desirable.</p> |
| LPA364  | Button Family  | Burntwood  |  |  |  |  |  | <p>Oppose allocation of two pieces of GreenBelt land in Burntwood.</p> <p>Concerns over air pollution in town and cities which can only get worse and populations and vehicle usage increase. Green belt is there to clean our air and provide a breathing space between settlements, please focus on brownfield sites rather than increasing the size of settlements and destroying our towns lungs.</p> <p>People move to Burntwood because previous locations have been choked with traffic congestion, noise and pollution. By building on brownfield sites new traffic will have access to better road networks and bypass routes.</p> <p>Once Green Belt is lost it will break the continuous chain utilised by animals, insects and birds to move around town.</p> <p>We should pay more attention to the network of footpath and bridle paths and make geo-orientation trails, cycle routes and nature works.</p> <p>Greenbelt is favoured by developers for executive homes, whereas housing on brownfield sites tend to be smaller more affordable homes, which are those badly needed by our young people.</p>  |
| LPA365  | Troy Farrington  | Burntwood  |  |  |  |  |  | <p>Opposes development in the Green Belt south of Highfields Road. It would be devastating to see it being turned into urban landscape. The Green Belt should be kept because it provides land for animals to graze on and crops to be grown on. People enjoy and like having Green Belt surrounding them. Need to think about schools and doctors because lots of schools are full and you have to wait weeks for a doctors appointments.</p>   |
| LPA366  | Robert Birch   | Burntwood Housing Allocations                      |  |  |  |  |  | <p>Accepts the need for housebuilding in the area but feels that there is a problem with the amount of housing along with the affordability of it and availability of social housing also that it should not result in the destruction of our open green spaces.</p> <p>Businesses, schools, banks, post offices and doctors surgeries have all reduced whilst the population has increased as well as the roads seeing a reduction in investment as the same time as an increase in traffic.</p> <p>It seems as if this is a direct attack on the people of Burntwood and Hammerwick by the Conservative Council.</p> <p>Remains unconvinced that 'all other reasonable options' have been examined.</p> <p>Regarding the proposals from Bloor Homes it seems there is limited options for social housing and affordable family homes, the main emphasis seems to be on executive style housing.</p> <p>The increase in local population should be matched with an increase of investment in the area.</p> <p>Wants Burntwood to be a better place to live not bigger.</p>  |
| LPA367  | John Butler  | Burntwood  |  |  |  |  |  | <p>Objects to proposal to build houses on green belt land, specifically Policy B1 Site B14 land south of Highfields Road. The local infrastructure is not capable of taking on additional people, increase in traffic, there are more viable brownfield sites, Burntwood is not big enough to cater for additional homes, the dam at Chasewater poses a flood risk to the proposed new development.</p> <p>The water from housing development built in the 70/80s flows in Crane Brook combined with water from the new development can lead to a greater flood risk in the area.</p>  |

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| LPA368  | John Butler     | Site B14                             | No | No | No (justified) |     |     | The land is in the green belt.<br>The local infrastructure cannot take more housing   |
| LPA369  | Peter Gostling  | Burntwood                            |    |    |                |     |     | Objects to proposed developments that will take Green Belt land from the areas surrounding Burntwood.<br><br>To lose more green belt when brownfield areas are available cannot be allowed. Infrastructure can barely cope existing numbers within the area. To deliberately destroy green areas that form the foundation of so much pleasure and leisure cannot be allowed.<br>Developers always seem to target building larger properties. Lichfield and its surrounding area have a large 'aged' population. Before any additional needs are mindlessly built a study of the existing population structure and properties linked to them would help analyse exactly what the area needs.<br>Ensure systems exist that not only retain but improve the quality of life in the area.<br>Consideration of employment provision is also vital if the commuter overload is not to be added to or is that what they intend doing with the brown-fill options that are being ignored as home development areas.   |
| LPA370  | John Turnbull   | Site B14                             |    |    |                |     |     | Considers the increase in housing numbers in Burntwood, is fabricated to bring pressure to bear on the Green Belt and set a precedent for future removal.<br>LDC approach is to come up with an argument that the piece of Green Belt under immediate threat is of low Green Belt value. Considers the reason relating to the M6 Toll flimsy because the presence of the road in the Green Belt is of no consideration under the NPPF. The LDCs first Green Belt appraisal pronounced this section of GB as important for three reasons set out in the NPPF, this importance is clearly seen when standing in the narrow gap between Burntwood and Brownhills.<br><br>See no evidence that LDC has complied with NPPF requirement that they plan positively to enhance the beneficial use of the Green Belt. Would like to know what alternative uses have been considered including renewable alternatives which preserve the openness of the Green Belt. What beneficial uses have been looked and reasons why they have not been adopted or promoted.<br>LDC is ignoring the Green Belt second appraisal which sets out principles for Green Belt removal is not considered parcel E1, land west of Coulter Lane. The reason is vague but suggests the land is too big and they discount safeguarding land. This doesn't make sense and the conclusions to use Highfields Road will in the end use more Green Belt.  |
| LPA371  | Angela Turnbull | Burntwood                            |    |    |                |     |     | Building on the green belt is inexplicable. Using the land for recreational purposes would be more beneficial to the community.<br>Building houses on Highfields Road without putting any infrastructure into place makes no sense. The primary schools are almost at capacity, doctors surgeries are full.<br>LDC is planning on using Mouth Road for housing development which means even less employment land in the area to attract new businesses. Its time to consider bringing the Hammerwich railway link back.<br>Land off Coulter Lane could be built on without any detrimental effect on 'openness' of the Green Belt as it is a natural infill between two developments.<br>Why allow developers to keep building small development which means the local community does not get enough money from the development to do anything substantial to improve their local area.<br>LDC IDP is just an exercise to justify building 250 houses on Green Belt.<br>A reduction in rates for people having their views taken away would be a nice 'sweetener' and making sure any 106/CIL money is used to enhance the communities that are affected. Liaise with SCC to maintain road, better street lighting and provide adequate services.   |
| LPA 372 | Mr David Morris | 12.14 to 12.16. S2 - Pumping Station | No | No | No             | Yes | Yes | Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.<br>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building. There is justification for loss of Green Belt. There is no evidence that the use of Birchbrook Industrial Estate and Shenstone Business Park for housing has been considered and their re-use would rid the village of HGV's 'killing 2 birds with 1 stone' The Neighbourhood Plan Sustainability Appraisal excluded S2 as it would have an adverse environmental impact.   |
| LPA 373 | Mr Peter Ruscoe | 12.14 to 12.16. S2 - Pumping Station | No | No | No             | Yes | Yes | Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.<br>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 questioned by LDC. The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan that a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building.<br>The three major problems facing the village which will not be addressed by this proposal are; the number of heavy goods vehicles using Pinfold Hill; inadequate car parking at the station and the preservation of the Green Belt. rather than attempting to solve these problems on an individual basis a more creative solution would be to regard them as one problem which could be solved by exploiting fully the potential of the Shenstone Business Park |
| LPA 374 | Mr Peter Ruscoe | Site S3 (Shenstone)                  | No | No | No             | Yes | No  | Objects to the development at site S3 due to LDC previously accepting that the site was not suitable for new house building as part of Shenstone's Neighbourhood Plan. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014. LDC have failed in DtC duties as they have not ensured evidence is locally derived and failed to consider an approved Neighbourhood Plan. The three major problems facing the village which will not be addressed by this proposal are; the number of heavy goods vehicles using Pinfold Hill; inadequate car parking at the station and the preservation of the Green Belt. rather than attempting to solve these problems on an individual basis a more creative solution would be to regard them as one problem which could be solved by exploiting fully the potential of the Shenstone Business Park. The proposal will increase traffic on Pinfold Hill and increase the danger at the junction with Millbrook Drive. The proposal will increase the risk of flooding.  |

|         |                     |                                      |    |    |    |     |     |  |
|---------|---------------------|--------------------------------------|----|----|----|-----|-----|--|
| LPA 375 | Mrs Susan Whittock  | Site S3 (Shenstone)                  | No | No | No | Yes | No  | Objects to the development at site S3 due to LDC previously accepting that the site was not suitable for new house building as part of Shenstone's Neighbourhood Plan. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014. LDC have failed in DtC duties as the have not ensured evidence is locally derived and failed to consider an approved Neighbourhood Plan.   |
| LPA 376 | Mrs Susan Whittock  | 12.14 to 12.16. S2 - Pumping Station | No | No | No | Yes | Yes | Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.<br>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 questioned by LDC. The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan that a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building. Further investigation of use of the business park for housing should be made. |
| LPA 377 | Mrs Charlotte Walk  | Site S2 (Shenstone)                  | No | No | No | Yes | No  | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building. In addition the application for planning permission applied for by CT Planning the South Staffordshire Waterworks in Planning document CET/3511 on 6th October 2016LA was not considered in the local plan.   |
| LPA 378 | Gurdev Singh Sagoo  | Site S2 (Shenstone)                  | No | No | No | Yes | No  | The council's objective assessment of site S2 is undermined by the council previously accepting the 2015 draft Shenstone Neighbourhood Plan because professional sustainability evaluation demonstrated that proposed site S2 was not suitable for new house building. The Local Allocations Plan document has not considered releasing more land for new housing adjacent to the existing resident endorsed and Neighbourhood Plan agreed/approved 2.1 hectares of land at Shenstone Business Park. 80% of the residents of Shenstone in the Neighbourhood Plan Submission of Evidence were supportive of the use of the Business Park for new housing in 2014.   |
| LPA 379 | Gurdev Singh Sagoo  | Site S3 (Shenstone)                  | No | No | No | Yes | No  | Objects to the development at site S3 due to LDC previously accepting that the site was not suitable for new house building as part of Shenstone's Neighbourhood Plan. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014. LDC have failed in DtC duties as the have not ensured evidence is locally derived and failed to consider an approved Neighbourhood Plan  |
| LPA 380 | Joginder Kaur Sagoo | Site S3 (Shenstone)                  | No | No | No | Yes | No  | Objects to the development at site S3 due to LDC previously accepting that the site was not suitable for new house building as part of Shenstone's Neighbourhood Plan. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014. LDC have failed in DtC duties as the have not ensured evidence is locally derived and failed to consider an approved Neighbourhood Plan  |
| LPA 381 | Andrew Bews         | Site S3 (Shenstone)                  | No | No | No | Yes | No  | Objects to the development at site S3 due to LDC previously accepting that the site was not suitable for new house building as part of Shenstone's Neighbourhood Plan. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014. LDC have failed in DtC duties as the have not ensured evidence is locally derived and failed to consider an approved Neighbourhood Plan  |
| LPA 382 | Stephen Palmer      | Site S3 (Shenstone)                  | No | No | No | Yes | No  | Objects to the development at site S3 due to LDC previously accepting that the site was not suitable for new house building as part of Shenstone's Neighbourhood Plan. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014. LDC have failed in DtC duties as the have not ensured evidence is locally derived and failed to consider an approved Neighbourhood Plan  |
| LPA 383 | Barbara Palmer      | Site S3 (Shenstone)                  | No | No | No | Yes | No  | Objects to the development at site S3 due to LDC previously accepting that the site was not suitable for new house building as part of Shenstone's Neighbourhood Plan. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014. LDC have failed in DtC duties as the have not ensured evidence is locally derived and failed to consider an approved Neighbourhood Plan  |
| LPA 384 | Sandra Miller       | Site S3 (Shenstone)                  | No | No | No | Yes | No  | Objects to the development at site S3 due to LDC previously accepting that the site was not suitable for new house building as part of Shenstone's Neighbourhood Plan. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014. LDC have failed in DtC duties as the have not ensured evidence is locally derived and failed to consider an approved Neighbourhood Plan  |
| LPA 385 | Gary Jones          | Site S3 (Shenstone)                  | No | No | No | Yes | No  | Objects to the development at site S3 due to LDC previously accepting that the site was not suitable for new house building as part of Shenstone's Neighbourhood Plan. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014. LDC have failed in DtC duties as the have not ensured evidence is locally derived and failed to consider an approved Neighbourhood Plan  |
| LPA 386 | Kay Lindley         | Site S3 (Shenstone)                  | No | No | No | Yes | No  | Objects to the development at site S3 due to LDC previously accepting that the site was not suitable for new house building as part of Shenstone's Neighbourhood Plan. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014. LDC have failed in DtC duties as the have not ensured evidence is locally derived and failed to consider an approved Neighbourhood Plan  |
| LPA 387 | Emily Lindley       | Site S3 (Shenstone)                  | No | No | No | Yes | No  | Objects to the development at site S3 due to LDC previously accepting that the site was not suitable for new house building as part of Shenstone's Neighbourhood Plan. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014. LDC have failed in DtC duties as the have not ensured evidence is locally derived and failed to consider an approved Neighbourhood Plan  |
| LPA 388 | Christine Webb      | Site S3 (Shenstone)                  | No | No | No | Yes | No  | Objects to the development at site S3 due to LDC previously accepting that the site was not suitable for new house building as part of Shenstone's Neighbourhood Plan. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014. LDC have failed in DtC duties as the have not ensured evidence is locally derived and failed to consider an approved Neighbourhood Plan  |







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|---------|------------------------|---------------------|----|----|----|-----|-----|---|
| LPA 427 | Justin Dawson          | Site S2 (Shenstone) | No | No | No | Yes | No  | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building. In addition the application for planning permission applied for by CT Planning the South Staffordshire Waterworks in Planning document CET/3511 on 6th October 2016LA was not considered in the local plan.  |
| LPA 428 | Robert Olliffe         | Site S2 (Shenstone) | No | No | No | Yes | No  | The LDC objective assessment of site S2 has been significantly undermined by LDC having previously accepted that (i) as part of the 2015 draft Shenstone Neighbourhood Plan that a professional sustainability evaluation demonstrated that the site S2 was not suitable for new house building (ii) an independent Planning Inspectors report in April 2016 did not challenge the sustainability assessment conclusion that site S2 was not suitable for new house building and (iii) the Shenstone Neighbourhood Plan was "made" at a Cabinet meeting in December 2016 on the basis that site S2 was not suitable for new house building. In addition the application for planning permission applied for by CT Planning the South Staffordshire Waterworks in Planning document CET/3511 on 6th October 2016LA was not considered in the local plan.   |
| LPA429  | David McCallum         | Burntwood           |    |    |    |     |     | <p>Objects to the identification of large swathes of greenbelt and green field sites for housing development. Opposes land off Highfields Road.</p> <p>Highfields Road is close to M6 Toll, Brownhills and West Midlands Conurbation. There is little greenland separating Staffordshire and West Midlands due to the construction of the M6 Toll and the argument the M6 Toll creates a natural barrier is wrong. Why has no consideration been given to areas to the north and east of Burntwood where development would not put so much stress on the thin band of Greenbelt. The farmland has significant use by migrating wildlife which uses nearby Chasewater. Development would remove the natural habitat and there is a significant risk of losing 'green corridors'. Highfields Road and surrounding roads are in a poor state of repair and would not be capable of sustaining the extra traffic. Has any consideration been given to the potential disaster that could occur if anything happens to the dam. The presence of new houses would put pressure on public services in the area. There are plenty of brownfield sites in Burntwood, Chasetown and Chase Terrace that could be used to build new housing</p> <p>LDC appear to have drawn up plans without consultation with local communities and without visiting sites. There is a need to explore all options before committing Burntwoods green fields to housing and destroying it for future generations.</p>   |
| LPA 430 | Burntwood Action Group | 9 Burntwood         |    |    |    | Yes | Yes | <p><b>Objection</b></p> <p>BAG opposes allocation of Green Belt land around Burntwood, in particular site B14 and asserts that LDC has not sufficiently explored alternatives re. Brownfield land. Considers that Planners have made minimum effort to bring forward BF sites for housing development and have taken the easy option of removing B15 from the Green even though it is more than half a mile from the nearest main road and bus route, off a narrow country lane and two miles from Burntwood Town Centre at Sankeys Corner. It is far from a sustainable site. The Green Belt on both sides of Coulter Lane is of great importance in retaining the character and identity of the old historic Burntwood village.</p> <p>The Green Belt supplementary report is regarded as a "travesty" as it was devised and written in such a manner as to class previously chosen parcels of land as not being important to the Green Belt.</p> <p>Site B4 of the allocations document is a relatively small part of the dilapidated Mount Road Industrial estate. Burntwood Action Group believes that, if Planners pursue the release of this land with more vigour, most of it could become available for housing before the end of the Plan period.</p> <p>Birmingham's aim to get neighbouring authorities to accept some of its housing requirement should be resisted vigorously. Birmingham has much previously used land and should be encouraged to prepare it for housing development. The loss of integrity of parts of the Green Belt can be attributed to "bending the rules" and developers finding ever more ingenious ways to argue that their developments are "appropriate," or under "special circumstances."</p> <p>BAG disagrees with the Burntwood Neighbourhood Plan HRA/ SEA Screening report Jan 2017 as it only looks at "Natura 2000 Wildlife" sites, and "European Sites" i.e. Cannock Chase. It doesn't take into account any other wildlife in the local Burntwood area. So implies, the destruction and displacement of any other wildlife habitat is acceptable. This fails to consider the ecological importance of Site B15.</p> <p>LDC's current Local Plan offers no concrete solutions to Burntwood's lack of infrastructure. Instead, its proposed housing allocation appears to be nothing more than a list to make up numbers rather than a strategy to provide housing of the right type in the right place to reflect the needs of the population.</p> <p>Burntwood lacks a coherent town centre and the approach taken by the Local Plan Allocations will not help remedy this.</p> |
| LPA 431 | Frances Stockton       | Site S3 (Shenstone) | No | No | No | Yes | No  | Objects to the development at site S3 due to LDC previously accepting that the site was not suitable for new house building as part of Shenstone's Neighbourhood Plan. Just fewer than 80% of the residents of Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing in 2014. LDC have failed in DiC duties as they have not ensured evidence is locally derived and failed to consider an approved Neighbourhood Plan. Is concerned about the impact of flooding and encloses a photograph of the area under water after a period of torrential rain.  |
| LPA 432 | Stephen Judd           | Site S3 (Shenstone) | No | No | No | Yes | No  | The proposals ignore the impact on the environment and wildlife. The area is on a flood plain, access would create huge environmental issues. The Brownfield site in Birchbrook Industrial estate would have a neutral effect on the above. The proposal is ill conceived, underhand and not prepared by Council officials fit to discharge their civic responsibilities.   |



|         |                |                     |    |    |    |     |    |  |
|---------|----------------|---------------------|----|----|----|-----|----|--|
| LPA 433 | Ann Williams   | para 12.14          | No | No | No | Yes | No | Lichfield District Council has failed to discharge the Duty to Co-operate and listen to local people. It has not considered the approved Shenstone Neighbourhood Plan, made no attempt to consult the Parish Council, groups who approved the Plan which had passed a vote by local residents. Since a Neighbourhood Plan in 2015 (draft) demonstrated that the S2 site was not suitable for new house building and this was endorsed by the latest Plan it would appear that LDC has done no preparation. The Local Allocations Plan document has not considered releasing more land for new housing adjacent to the existing, resident endorsed and Neighbourhood Plan agreed and approved i.e 2.1 Hectares of land at Shenstone Business Park.  |
| LPA 434 | Roddy Williams | para 12.14          | No | No | No | Yes | No | Lichfield District Council has failed to discharge the Duty to Co-operate and listen to local people. It has not considered the approved Shenstone Neighbourhood Plan, made no attempt to consult the Parish Council, groups who approved the Plan which had passed a vote by local residents. Since a Neighbourhood Plan in 2015 (draft) demonstrated that the S2 site was not suitable for new house building and this was endorsed by the latest Plan it would appear that LDC has done no preparation. The Local Allocations Plan document has not considered releasing more land for new housing adjacent to the existing, resident endorsed and Neighbourhood Plan agreed and approved i.e 2.1 Hectares of land at Shenstone Business Park.  |
| LPA 435 | Stephen Judd   | Site S2 (Shenstone) | No | No | No | Yes | No | A professional sustainability evaluation demonstrated that this site is not suitable for new house building. The proposals ignore the impact on the environment and wildlife. This area is a flood plain and access would create huge environmental issues. Suggests releasing 2.1 ha of land from Shenstone Business Park instead. Building on this land would have a neutral effect on the environment   |
| LPA436  | Mr John Lumb   | Site S3 (Shenstone) | No | No | No | Yes | No | Objects to the development at site S3 due to LDC previously accepting that the site was not suitable for new house building as part of Shenstone's Neighbourhood Plan. Shenstone in the NP Submission of Evidence approved of the use of the Business Park for new housing. LDC have failed in DTC duties as they have not ensured evidence is locally derived and failed to consider an approved Neighbourhood Plan. The three major problems facing the village which will not be addressed by this proposal are; the number of heavy vehicles using Pinfold Hill; inadequate car parking at the station and the preservation of the green belt. The volume of traffic currently using Pinfold Hill is increasing and any increase in the number of vehicles entering and leaving Millbrook Drive can only increase the danger at the junction. The land in question is in flood plain   |
| LPA 437 | Elaine Whitney | Site S3 (Shenstone) | No | No | No | Yes | No | The site S3 needs to be excluded as a site for new house building on the basis that the Neighbourhood Plan Sustainability Appraisal (Pages 30,31 and 32) concluded that low access to village amenities, the increase in car movements in the village centre, adverse environmental impact, loss of agricultural land, impact on public open space, adverse biodiversity and adverse landscape impact all pointed to its exclusion and remain valid. LDC has failed to consider releasing more land at Shenstone Business Park and/or Birchbrook Industrial Estate. These two sites were the preferred sites by the vast majority of the people of Shenstone and could provide further housing including starter homes for young couples wanting to remain in the village, apartments for the increasing number of single households and bungalows for the increasingly elderly population and disabled persons. It would also greatly reduce heavy traffic with the attendant pollution, noise wear and tear and safety concerns with Lorries known to have mounted the kerbs. The Green Belt should be preserved as the whole village enjoy using Lamas Land |
| LPA 438 | Ian Tucker     | Site S3 (Shenstone) | No | No | No | Yes | No | In the Pinfold Hill Planning Brief (Southern District Plan) dated March 1985 the land in question was described as 'Flood Plain and Washland of the Bourne Brook' and floods regularly and onto the land contained within Site S3. Building on the flood plain will only increase the risk to existing, adjacent properties.<br><br>Access to and from S3 will be via a single narrow access onto Millbrook Drive and also via a single access to the already heavily congested Pinfold Hill. Any increase in the number of vehicles entering and leaving Millbrook Drive can only increase the danger at its junction with Pinfold Hill.<br><br>The land contained within Site S3 entered private ownership as a result of an agreement with Shenstone Parish Council in 1998. Part of this agreement stated that the land in question would remain within the Green Belt (Shenstone Parish Council letter 20/05/98)  |
| LPA 439 | Carol Tucker   | Site S3 (Shenstone) | No | No | No | Yes | No | In the Pinfold Hill Planning Brief (Southern District Plan) dated March 1985 the land in question was described as 'Flood Plain and Washland of the Bourne Brook' and floods regularly and onto the land contained within Site S3. Building on the flood plain will only increase the risk to existing, adjacent properties.<br><br>Access to and from S3 will be via a single narrow access onto Millbrook Drive and also via a single access to the already heavily congested Pinfold Hill. Any increase in the number of vehicles entering and leaving Millbrook Drive can only increase the danger at its junction with Pinfold Hill.<br><br>The land contained within Site S3 entered private ownership as a result of an agreement with Shenstone Parish Council in 1998. Part of this agreement stated that the land in question would remain within the Green Belt (Shenstone Parish Council letter 20/05/98)  |
| LPA 440 | Carol Tucker   | Site S2 (Shenstone) | No | No | No | Yes | No | The Neighbourhood Plan Sustainability Appraisal concluded that the adverse environmental impact, loss of agricultural land, adverse ecological impact and adverse landscape impact all pointed to the exclusion of S2 as a site for new house building.<br><br>The removal of S2 would allow further investigation of the potential of the Shenstone Business Park sites opposite for additional mixed-use housing and commercial development and allow for more creative solutions to be examined in order to deal with the whole village issue regarding the number of HGVs using Pinfold Hill to access the Industrial Park.  |

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|---------|-------------------------|--|----|----|----|------------|----|---|
| LPA 441 | Ian Tucker              | Site S2 (Shenstone)                      | No | No | No | Yes        | No | <p>The Neighbourhood Plan Sustainability Appraisal concluded that the adverse environmental impact, loss of agricultural land, adverse ecological impact and adverse landscape impact all pointed to the exclusion of S2 as a site for new house building.</p> <p>The removal of S2 would allow further investigation of the potential of the Shenstone Business Park sites opposite for additional mixed-use housing and commercial development and allow for more creative solutions to be examined in order to deal with the whole village issue regarding the number of HGVs using Pinfold Hill to access the Industrial Park.</p>  |
| LPA 442 | Burntwood Action Group  | Burntwood Policy B1, Site B14 & Site B15 |    |    |    | No (sound) |    | <p>2383 signed copies of a letter opposing the plans to remove land surrounding Burntwood from the Green Belt.</p> <p>For the past 60 years Burntwood has been allowed to sprawl across valuable green land. It is now time to call a halt and value all the Green Belt which surrounds it. Planners might look at a map and see likely infill spaces but I see land which helps to breathe life into the community.</p> <p>The Plan Strategy aims to focus future housing on the District's "key sustainable settlements". Sites such as these, in Green Belt on the periphery of Burntwood, are not sustainable. Planned improvements to Burntwoods infrastructure will not make up for the lack of investment over many decades and do not justify further outward expansion.</p> <p>Few residents of Burntwood are employed locally and outward commuting makes all routes out of the are highly congested at peak times. Further expansion of Burntwood boundary will exacerbate the situation.</p> <p>The questioning of Lichfield District Planners has revealed that insufficient effort has been put into bringing forward old and dilapidated industrial sites for housing development. They must now stop looking for the easy option and work with the local community and their representatives for the release of brownfield sites for housig and thereby rejuvenate existing eyesores</p>  |
| LPA 443 | Hammerwich Action Group | Burntwood                                |    |    |    |            |    | <p>2007 signed copies of a letter opposing the development of 250 houses to the south of Burntwood.</p> <p>The development is proposed within the Green Belt, contrary to the National Plannign Policy Framework Section 9 'Protecting Greenbelt Land'</p> <p>Lichfield District Council's own Green Belt reviews determined the area of Green belt proposed for development is narrow and too important to build on.</p> <p>Burntwood does not have a high enough level of facilities and services to match existing housing, let alone for more housing</p> <p>The road infrastructure in and beyond Burntwood is inadequate and under further stress from increased traffic from development in surrounding towns, leading to longer queues, increased pollution and greater risk of accidents. A town from where most people commute by car for work and shopping, and does not have a railway, is not sustainable.</p> <p>The Green Belt is not only enjoyed by those privileged to live on its edge but by everyone that uses it for recreation, dog walking etc. The proposal does not protect the quality and character of the country side and existing communities.</p> <p>LDC has unilaterally without consulting with the local people on such a contentious issue proceeded to promote this site. This is contrary to the Conservative manifesto 2015 that states they 'will ensure local people have more control over planning and protect the Green Belt.' LDC have ignored the needs and broader interests held by the community, who have previously objected to this proposals in their thousands.</p> |

## Appendix B - Summary of Late Representations

| Representation Ref. | Consultee/Agent        | Section                          | Duty to Cooperate | Legally and procedurally Compliant? | Sound? (inclusive of postively prepared, justified, effective and compliance with NPPF) | Does the respondent suggest changes   | Does the respondent wish to appear at EIP | Comment Summary   |
|---------------------|------------------------|----------------------------------|-------------------|-------------------------------------|---|---|---|---|
|                     | Christopher Pincher MP | 12.14 - 12.16 Policy S1, S2 & S3 | Yes               | No                                  | No  | <p>Site S2 should be deleted</p> <p>Site S3 should be deleted</p> <p>Consider releasing more land for housing adjacent to the NP agreed 2.1 ha of land at Shenstone Business Park (Site S1)</p> |   | <p>Lichfield District Council has failed to discharge the DtC as it has not attempted to specifically consult or reach agreement with Shenstone Parish Council as the accountable body for the Shenstone NP.</p> <p>At no time during the three year process of assembling the Shenstone Neighbourhood Plan ending December 2016 was the objectivity of excluding Sites S2 and S3 questioned by LDC. This in turn questions the objective preparation by LDC adopting the proposal in February 2017 that the site is now suitable for new house building.</p> <p>Policy Shen4 of Lichfield Local Strategy identifies a range of between 50 - 150 dwellings to be delivered in Shenstone over the plan period and this should not be achieved by allocating unsustainable sites. Site allocations S2 and S3 do not represent sustainable development sites when compared with others across the district. It is unclear why the Local Plan Allocations Document proposes to allocate Site S1 when its already allocated by the Shenstone Neighbourhood Plan (Policy HA1).</p> <p>The plan is not justified because it has not been considered against reasonable alternatives and it is not effective as it has not been justified that it is deliverable over the plan period. Outlines site specific issues and raises a concerns relating to lack of evidence regarding viability for Sites S2 and S3.</p> <p>The strategic issue of delivering housing in Shenstone could have been effectively dealt with through cross- boundary working between the Parish Council and Lichfield District Council. Important information that would have assisted the neighbourhood plan process has not been forthcoming from LDC.</p> <p>LDC has failed to discharge the duty to cooperate as (a) has not followed the test it set itself of ensuring that evidence collected to support the Plan and SA is locally derived; and (b) it has not identified or considered in the Sustainability Appraisal that an approved Shenstone Neighbourhood Plan has also considered the sustainability impact of sites S2 and S3; and (c) has not made any attempt to specifically consult with or reach agreement with the Parish Council or the directly relevant residents groups that assembled and approved the Neighbourhood Plan.</p> <p>The validated and approved framework neighbourhood plan framework policy processes resulted in sites S2 &amp; S3 being rejected for building of new homes. LDC subsequently approved these April 2016 conclusions.</p> |

|  |   |                              |    |    |     |  |    |  |
|--|---|------------------------------|----|----|-----|--|----|--|
|  | Identical representations have been received from the following: S J Dennis, Nigel Welsby, Brad Welsby, Nigel Cartwright, Liza Burnell, A Walsh | Policy B1. Site B14          | No | No | Yes |  | No | <p>Object to the proposed development of 250 houses to the south of Burntwood-</p> <p>a) The development is proposed with the Green Belt, contrary to the NPPF Section 9 Protecting Green Belt land;</p> <p>b) LDC GB Review determined the area of Green Belt proposed for development is narrow and too important to build on;</p> <p>c) Burntwood does not have a high enough level of facilities and services to match existing housing let alone more housing;</p> <p>d) The road infrastructure in and beyond Burntwood is inadequate and under further stress from increased traffic from development in surrounding towns, leading to longer queues, increased pollution and greater risk of accidents. A town from where most people commute by car for work and shopping, and does not have a railway, is not sustainable;</p> <p>e) the Green Belt is not only enjoyed by those privileged to live on its edge but by everyone that uses it for recreation, dog walking etc., The proposal does not protect the quality and character of the countryside and existing communities;</p> <p>f) LDC has unilaterally, without consulting with the local people on such contentious issue, proceeded to promote this site.</p> <p>This is contrary to the Conservative manifesto 2015 that states they 'will ensure local people have more control over planning and protect the Green Belt' LDC have ignored the needs and broader interests held by the community, who have previously objected to this proposal in their thousands.</p>  |
|  | Anne C Gregory  | Policy B1. Site B14          | No | No | Yes |  | No | <p>Object to the proposed development of 250 houses to the south of Burntwood-</p> <p>a) The development is proposed with the Green Belt, contrary to the NPPF Section 9 Protecting Green Belt land;</p> <p>b) LDC GB Review determined the area of Green Belt proposed for development is narrow and too important to build on;</p> <p>c) Burntwood does not have a high enough level of facilities and services to match existing housing let alone more housing;</p> <p>d) The road infrastructure in and beyond Burntwood is inadequate and under further stress from increased traffic from development in surrounding towns, leading to longer queues, increased pollution and greater risk of accidents. A town from where most people commute by car for work and shopping, and does not have a railway, is not sustainable;</p> <p>e) the Green Belt is not only enjoyed by those privileged to live on its edge but by everyone that uses it for recreation, dog walking etc., The proposal does not protect the quality and character of the countryside and existing communities;</p> <p>f) LDC has unilaterally, without consulting with the local people on such contentious issue, proceeded to promote this site. This is contrary to the Conservative manifesto 2015 that states they 'will ensure local people have more control over planning and protect the Green Belt' LDC have ignored the needs and broader interests held by the community, who have previously objected to this proposal in their thousands. The proposed development beside Coulter Lane will destroy the character of the area - also there is NO infrastructure in the area, no shops, no buses! Why not build on one of the numerous 'brownfield' sites in Burntwood 'town' They are eyesores!</p> |
|  | Councillor Kenneth Humpreys   | Policy B1, Sites B14 and B15 |    |    |     | Remove Sites B14 and B15 and replace with alternative sites proposed | No | <p>I am in agreement with Burntwood and Hammerwich Action Groups, that most if not all the extra housing can, and should be placed on brown field sites. I realise that not all brown field land would be available in the required time, and hereby recommend that the following alternative land be investigated and substituted.</p> <p>Remove B14 This land has a considerable slope, does not have adequate access. It is a buffer between Staffordshire and the West Midlands and is now even more important to keep since the building of the M6 Toll. As an Alternative I offer Roundhill Farm- situated on Ogle Hay Rd and the A5 which is flat, has direct access to a large traffic island and will not have the same impact on Burntwood and Hammerwich, the owner is happy for the</p>  |

|  |   |                       |  |  |    |   |   |
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|  |   |                       |  |  |    |   | land to be included.<br>Remove B15 - Surrounding road network is totally inadequate for present traffic usage. As an alternative I offer land running along Green Lane which has access onto the same traffic island as my alternative to B14, it is flat and at present is an eyesore. Part of it used to be used as a part of Hammerwich playing field which was dissected by the M6 Toll It could also be a time to clean up the area in general.  |
|  | Richard Brown (CBRE Ltd) on behalf of Homes and Communities Agency) | Policy R1 Page 67 &68 |  |  | No | Identify additional deliverable and sustainable site allocations such as the HCA land identified in the letter. Consider these alternatives and reasonable alternatives with the same level of scrutiny, including in relation to Green Belt alternatives, to those currently proposed for allocation | Policy R1 is not positively prepared as housing will not be delivered at Rugeley Power Station until sometime after 2020 due to the previous use of the site which requires comprehensive demolition and decontamination. It is not clear that reasonable alternatives have been considered to meet the unmet housing needs of Rugeley on land around Rugeley in the short to medium term. Two sites have been proposed for development and additional information provided: sites plans; an assessment of the sites against the 5 Green Belt principles; Assessment of the Sites against NPPF Core Principles; Consultation Response Form; Updated Promotion Document. |

# Supplementary Planning Document – Rugeley Power Station Development Brief



Cabinet Member: Councillor I. Pritchard

Date: 19<sup>th</sup> September 2017

Agenda Item: 8

Contact Officer: Craig Jordan/ Ashley Baldwin

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ashley.baldwin@lichfielddc.gov.uk

Key Decision? **NO**

Local Ward Members  
Cllr Marshall, Cllr Tittley and Cllr Cox

**Economic Growth,  
Environment and  
Development (Overview  
and Scrutiny)  
Committee**

## 1. Executive Summary

- 1.1 Rugeley Power Station ceased power generation in 2016 and is currently being de-commissioned prior to demolition. The site traverses the boundary of Lichfield District and Cannock Chase District and presents a significant opportunity for brownfield redevelopment.
- 1.2 The Local Plan Allocations document identifies the Power Station site as an opportunity to deliver a minimum of 800 dwellings within Lichfield District and commits the Council to producing a development brief, to be adopted as a Supplementary Planning Document (SPD) in collaboration with Cannock Chase District Council to guide the future redevelopment of the site.
- 1.3 A joint Rugeley Power Station Development Brief SPD has been prepared by both authorities and has been the subject of a six week public consultation. This report outlines the key matters arising from the consultation received and proposed amendments prior to approval and adoption.

## 2. Recommendations

- 2.1 The Economic Growth, Environment and Development Overview and Scrutiny Committee note the summary of responses received.
- 2.2 That the Committee note the Officer responses and additional work required as outlined in **Appendix A** and agree to an update being prepared with a view to adopt the Rugeley Power Station Development Brief SPD at Cabinet.

## 3. Background

### *Overview*

- 3.1 The purpose of this report is to update Members on the responses received during the six week consultation and in due course seek approval for the adoption of the Rugeley Power Station SPD subject to modifications being made in accordance with the **Appendix A** to this report.
- 3.2 Members will recall that the Rugeley Power Station is currently being de-commissioned pending its re-development and re-use for other purposes. The site presents a significant brownfield opportunity to deliver a minimum of 800 dwellings within Lichfield District along with employment land within Cannock Chase District and associated open space and facilities.

- 3.3 The SPD has been prepared to assist any future applicant when preparing their planning proposals and it will also assist the Local Planning Authority in assessing the merits of those proposals. The consultation draft SPD is available to view at the following [here](#).
- 3.4 The delivery of the SPD is fundamental to the delivery of Lichfield District's Local Plan. The emerging Local Plan Allocations document cites the former Power Station site as an opportunity to deliver a minimum of 800 dwellings over the plan period to 2029; if the site were not to come forward then there may be a need to find alternative provision within the District to meet the 800 dwelling shortfall.
- 3.5 Notably, the current HS2 Phase 2a consultation document states that land forming part of the former power station site may potentially be required during the construction phase of HS2. The Council are preparing a response to this consultation because this may have a significant impact upon the delivery of development during our Plan period (and that of Cannock Chase DC).

### *Consultation Process*

- 3.6 The legal requirements for producing a SPD require public consultation for a minimum of four weeks. Given the importance of the site to the surrounding area, it was agreed to undertake a joint consultation with Cannock Chase District Council for a period of six weeks between 24<sup>th</sup> July 2017 and 4<sup>th</sup> September 2017.
- 3.7 The following methods were used to promote the consultation:
- The document was published on both Lichfield District Council and Cannock Chase District Council website.
  - Copies of the document were made available at Lichfield District Council and Cannock Chase District Council principal offices.
  - Alternative formats were available if requested.
  - A press release was issued by both LDC and CCDC.
  - The consultation was advertised via the Corporate twitter and facebook accounts.

- 3.8 In addition officers attended (following invitation) Rugeley Town Council's meeting on 30<sup>th</sup> August 2017 to discuss the SPD.

### *Consultation Responses*

- 3.9 In total 115 representation were received by both Lichfield District Council and Cannock Chase District Council over the six week period.
- 3.10 The key points received in response to the consultation document are summarised below:
- A number of comments supportive of the approach towards preparing a joint SPD with Cannock Chase District Council
  - Local support for the retention of the Borrow Pit
  - A number of comments concerned with the impact of development on the local infrastructure
  - Local support for the retention of facilities within the site notably the model railway
  - Concerns over the impact of development on the Trent and Mersey Canal Conservation Area
  - A number of comments highlighting the desired mix of development and potential end uses on the site
  - Statutory bodies highlighted the need for an application to be accompanied by technical reports including a Flood Risk Assessment, Transport Assessment and Ecological Assessment.



- Representations highlighted that HS2 has identified an area of proposed safeguarded land within the site which includes the current main access to the power station.
- Development industry commented the Development Brief should be delayed to allow for greater certainty in respect of land uses, quantum and balance of land uses.
- Development industry commented that the site should be identified as a Strategic Development Area as significant infrastructure would be required to bring the site forward for development.
- Comments received in relation to the viability of the scheme and the need to ensure maximum flexibility for determining an appropriate balance of uses within the site.
- Development industry commented that the Borrow Pit is allocated for development within the Local Plan Strategy and therefore the Development Brief contradicts this.

### Next steps

3.11 In response to the representations received certain changes to the document are being proposed to address the matters raised and these are listed in APPENDIX A.

3.12 The Committee is asked to recommend to the Cabinet that the SPD is updated in light of the consultation responses received prior to adoption.

|  |   |
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| Alternative Options                                | <ol style="list-style-type: none"> <li>1. The Committee decide to not accept any or all of the suggested changes.</li> <li>2. The Committee recommend approval and adoption of the SPD without amendment.</li> </ol>  |
| Consultation                                       | <ol style="list-style-type: none"> <li>1. Consultation with key stakeholders has informed this SPD. The results of the public consultation are now reported.</li> </ol>   |
| Financial Implications                             | <ol style="list-style-type: none"> <li>1. There are no financial implications from this report</li> </ol>   |
| Contribution to the Delivery of the Strategic Plan | <ol style="list-style-type: none"> <li>1. Supports the priority of a vibrant and prosperous economy as it assists in the delivery of the planning function of the Council.</li> <li>2. Supports the priority of Healthy and Safe communities by ensuring the provision of housing.</li> <li>3. Supports the priority of Clean, green and welcoming places to live by assisting in allocating land for affordable housing, as well as supporting the delivery of residential and commercial developments.</li> </ol> |
| Equality, Diversity and Human Rights Implications  | <ol style="list-style-type: none"> <li>1. An Equality Impact Assessment has been carried out as part of developing the Local Plan strategy and the emerging Local Plan Allocations, this is considered to sufficiently deal with the Power Station site.</li> </ol>   |
| Crime & Safety Issues                              | <ol style="list-style-type: none"> <li>1. There are no crime and safety issues.</li> </ol>  |

|   | Risk Description   | How We Manage It   | Severity of Risk (RYG) |
|---|--|--|------------------------|
| A | That the SPD does not provide the necessary guidance for the future redevelopment of the site. | Consultation with key stakeholders and members of the task group has provided an opportunity for key concerns to be raised through the preparation of the SPD. | Green                  |
| B | Viability analysis presents an issues with bringing forward the site for redevelopment.        | Any evidence received will be reviewed and analysed. Viability and deliverability issues will need to be   | Yellow                 |

addressed to ensure the site can come forward for development.

#### Background documents:

- Local Pan Strategy 2015
- Local Plan Allocations Publication Document

#### Relevant web links:

- [Local Pan Strategy 2015](#) -
- [Local Plan Allocations Publication document](#)
- [Draft Rugeley Power Station SPD](#)



## Rugeley Power Station SPD consultation – Summary of Representations

| Consultee / agent | Comment summary   | Recipient  | Response   |
|-------------------|---|------------|--|
| AONB unit         | <p>Firstly, we welcome the commitment to collaboration shown by the two authorities on aligning policy approaches for this significant site. Alongside the Local Plans, the SPD will become an important element in the suite of CCC &amp; LDC planning documents.</p>  | LDC & CCDC | Comments noted   |
| AONB unit         | <p>It is noted that the Draft SPD refers to the AONB in Para. 2.53 (Trees &amp; Landscape) and that SAC mitigation is referred to in para 2.39 and in the list of Ecology &amp; Biodiversity measures in para 4.37. We acknowledge that the power station site is some distance from the AONB boundary and that demolition will actually result in it being less of a visible structure from inside the designated area (e.g. at Stile Cop, Castle Ring and Upper Longdon). In addition, we appreciate that the SPD has to focus primarily on the site based issues and the more immediate surroundings. However, we consider that a small number of additional references could be made to the relationship between the proposed development, the AONB and the SAC.</p> <p>We refer firstly to the likely scale of new housing that will be built there (a minimum of 800 dwellings) and the need to manage the environmental and recreational implications of the increase in population.</p> <p>Secondly, although the scale of employment development will be dictated by market conditions (see para. 4.11), there is potential for the site to accommodate very large buildings in terms of floor area and height, which could be visible from afar in the AONB. Accordingly, we would suggest the following short additions to the document.</p> <p>1 - A wider contextual plan (alongside Figs. 1 &amp; 2) showing AONB and SAC boundaries and possible references to the same on Fig2.10 (Services and Facilities).</p> <p>2 – Acknowledgement of the need for SAC mitigation as a constraint on page 24.</p> <p>3 – Brief references to the AONB and SAC Policies in the adopted Local Plans and to the AONB Management Plan (2014-2019) in Section 3 (Policy Context).</p> | LDC & CCDC | <p>Comments noted</p> <p>In response to suggestions:</p> <ol style="list-style-type: none"> <li>1. Wider contextual plan to be added</li> <li>2. Information will be reviewed to ensure all known constraints are identified</li> <li>3. Agree</li> <li>4. The need to take account of impacts on SAC and AONB will be noted in the SPD</li> <li>5. LDC &amp; CCDC will give further consideration to design issues</li> <li>6. Further consideration will be given to how the site relates to its surroundings and wider context</li> </ol> |

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|   | <p>4 – A further reference to SAC mitigation, noting that any potential increase in pressure on the AONB (in terms of adverse impacts on the landscape, scenic beauty and quiet enjoyment) on the designated area should be avoided, in the CIL and Developer Contributions section (Para. 3.22 onwards) and under 5, Delivery &amp; Implementation.</p> <p>5 – An additional reference in Para. 4.50 (Development Layout – Design Strategy) for the design of larger employment building, especially for higher level cladding and roofing materials, to take account of longer distance views from higher ground in the AONB.</p> <p>6 - A reference under Access &amp; Movement (paras. 4.18 – 4.25) to the desirability of links to and investment in the wider footpath and cycling network to increase sustainable access options to the AONB and other surrounding countryside.</p> |      |   |
| Brereton & Ravenhill Heritage Committee | The impact of the southern part of the site on the almost adjoining Trent and Mersey Canal Conservation will require careful consideration. Paragraph 2.18 should be expanded and strengthened to reflect this. Paragraph 2.25 states “...it is not considered that the development of this site will have a significant impact on heritage assets”. This is wrong. The Canal Conservation Area with its 18th-century canal and towpath is unquestionably a heritage asset. The draft should be amended to reflect this.   | CCDC | Comments noted – Reference to Conservation and Heritage including impact on setting will be strengthened in the SPD |
| Brereton & Ravenhill Heritage Committee | Figure 2.10 omits various facilities including Brereton Methodist church on Brereton Main Road.  | CCDC | Comments noted – Figure 2.10 can be amended   |
| Canal & River Trust                     | The Trent & Mersey canal runs to the south of the SPD area, and along its southern boundary at the eastern end. The Trust’s notified area under para (za) of schedule 4 of the DMPO falls within the SPD area in some places, and close to it in others. The canal falls within a Conservation Area where it adjoins the SPD area. The canal network is thus either a designated or non-designated heritage asset which forms part of the context of the SPD area.<br>It is possible that future developments within the SPD area could have an impact on the canal network and therefore we advise that information be required to support development proposals to demonstrate that this has been adequately mitigated.  | CCDC | Comments noted - SPD will be strengthened to take account of these issues   |

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|                     | The waterways can be used as tools in place making and place shaping, and contribute to the creation of sustainable communities. We seek for any development to relate appropriately to the waterway, minimise the ecological impacts and optimise the benefits such a location can generate for all parts of the community. The canal network provides a multitude of benefits, including the reservation and interpretation of the historic network, sustainable travel routes, recreation and leisure opportunities, biodiversity, improving health and wellbeing, and for educational activities.   |      |   |
| Canal & River Trust | <b>Biodiversity and recreation</b><br>Linking the wildlife corridor through the SPD site to the existing green infrastructure of the canal network at both eastern and western ends could result in positive benefits including the opportunity for a circular walking/cycling route.   | CCDC | Comments noted - SPD will be strengthened to take account of these issues |
| Canal & River Trust | <b>Heritage</b><br>The listed viaduct carrying the railway over the canal is in close proximity to the west of the SPD area and any development near to it should include an assessment of its impact on the designated heritage asset. Similarly, any development within the notified area or the designated Conservation Area should include a heritage impact assessment in order to preserve and enhance its character and appearance.  | CCDC | Comments noted - SPD will be strengthened to take account of these issues |
| Canal & River Trust | <b>Considering the canal as a sensitive receptor</b><br>For developments that fall within our notified area, the canal should be identified as a sensitive receptor when considering any potential harm and appropriate mitigation. This would be in relation to contaminated land, foul and surface water discharge, noise, air quality and water quality, as well as other site specific matters. Suitable surveys and reports should be included to support development proposals in the Development Management process in order that a proper assessment can be made of the impacts on our network. | CCDC | Comments noted - SPD will be strengthened to take account of these issues |
| Canal & River Trust | <b>Inclusion in pre-application discussions</b><br>The Trust notes the importance placed on pre-application discussions in the draft SPD. Where such schemes have the potential to affect the canal network, we ask that we be included in such discussions, or that the developers be encouraged to seek our advice directly.  | CCDC | Comments noted - SPD will be strengthened to take account of these issues |
| Canal & River Trust | <b>Sustainable use of canal water resources</b><br>The canal water can be a resource for low carbon methods of heating and cooling buildings, and should be promoted as such for sustainability, especially in relation to  | CCDC | Comments noted - SPD will be strengthened to take account of these issues |

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|  | commercial developments. Further information can be provided by the Trust to assist. There may also be options for the discharge of treated foul and/or surface water drainage to the canal and this should also be promoted to developers through the SPD.   |      |  |
| Canal & River Trust                        | <b>Potential increase in use of canal and towpath</b><br>Where developments are likely to result in an increase in use of the canal network, consideration should be given to any associated improvements that should be required.  | CCDC | Comments noted - SPD will be strengthened to take account of these issues                      |
| CCGs (Wood, E on behalf of the three CCGs) | The increase in housing provision identified within the Rugeley Power Station site is likely to impact on the health provision within Rugeley. Further dialogue will be required as the scale of the housing provision is quantified and more defined.  | CCDC | Comments noted   |
| Clay, M                                    | Before we make specific points, we would like to say we welcome the redevelopment of the site and believe it represents a unique opportunity for the town of Rugeley to shape its future. We are pleased that the present Supplementary Planning Document (SPD) demonstrates an intent to provide a mix of business and residential development, both of which are key to growing the town and local economy.   | CCDC | Comments noted   |
| Clay, M                                    | <b>Provision of HGV parking:</b><br>Here on Towers Business Park, there have been ongoing, chronic issues relating to HGV parking. Owing to a lack of adequate HGV parking within the greater area and also to a lack of foresight, management and enforcement in terms of parking regulations, many access roads on the Towers Business Park are perennially cluttered with HGV and PSV vehicles which have no business, whatsoever, on the Towers Business Park, but rather are simply using the roads for long term parking or, in certain cases, as a de-facto operating centre.<br><br>The issue creates a number of problems:<br>a.) Due to the nature of the parking, it is often long term, with trucks waiting, with their driver(s) for their next load/job, so the parking spaces can be occupied for several days on end. There are absolutely no provisions for toilet facilities.<br>b.) The spaces occupied by these vehicles mean that goods vehicles collecting from or delivering to businesses on the park – those with a legitimate reason to be there in other words – have nowhere to wait for their appointed load/unload time or to take mandatory tachograph breaks. | CCDC | Depending on the nature of the end users of the site these matters will be considered further. |

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|                | <p>c.) The extent of the parking -especially trucks parked right up to road junctions - can make it very difficult and even dangerous during peak commuting times. It also make it very awkward for large HGVs delivering plant or machinery to businesses on the site.</p> <p>In order to address this issue and ensure any business and industrial developments on the site of the former Rugeley Power Station do not suffer the same fate, the Council needs to consider the provision of HGV parking within the broader area and also how it is going to legislate those who continue to hinder legitimate business within Towers Business Park and any new developments. We have long suggested limiting waiting (and policing this with traffic wardens) to 1 hour during 0700 to 1800 hrs as a simple and pragmatic way of allowing some overnight parking and giving HGVs adequate waiting and break parking during the day, without enabling long-term parking.</p> |      |  |
| Clay, M        | <p><b>Provision of small industrial units:</b><br/> Since large deals like the Gazeley unit, now occupied by Amazon, are great for local authority kudos and publicity, and no doubt also good for employment within the area, it is sometimes easy to overlook the benefits and need for smaller industrial and commercial units. Provision of as wide a variety of unit sizes – and not overlooking the very smallest – is key to ensuring development of the local SME economy, both in terms of enabling local individuals the opportunity to become self-employed and also giving existing local businesses the space to expand.</p>   | CCDC | Comments noted   |
| Coal Authority | <p>I have reviewed our data and can confirm that the Rugeley Power Station Site does not contain any surface coal resources or recorded risks from past coal mining activity. On this basis the Coal Authority has no specific comments to make on the Development Brief SPD.</p>   | CCDC | Comments noted   |
| Craddock M     | <p>I really think this site would be an ideal opportunity to bring new companies to Rugeley or even existing Staffordshire businesses. Since moving to Rugeley and becoming a new Mum it is really apparent to me the amount of people who travel a long distance from Rugeley to work due there being very little employment in the area.</p> <p>The ideal use would be a business park with various companies on it. The local MP has been campaigning for more employment opportunities in Rugeley and this is an ideal opportunity. There could be ample car parking on site for employees. Nearby local</p>  | CCDC | Comments noted – infrastructure requirements will be considered further as the development progresses. |



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|                    | <p>businesses in the town would prosper from increased footfall of staff during their lunch breaks.</p> <p>There really is very little employment in Rugeley and all those people who worked at the power station have lost their jobs I'm sure they would be pleased to at least see Staffordshire council were trying to help boost employment.</p> <p>I really feel we don't need another housing development in Rugeley the GP surgeries can't cope as it is without an influx of new residents. We also only have one high school in Rugeley that is expected to cope with demand again more young families are bound to move to a new housing development and need high schools eventually.</p>   |            |   |
| Davey M            | I feel that full cognisance should be taken of the lack of employment in Rugeley and the surrounding district. There should be a maximisation of employment on this site with the maximum of 106 agreements so that infrastructure can be addressed.  | CCDC       | Comments noted – infrastructure requirements will be considered further as the development progresses |
| Environment Agency | <p><u>Environmental Permitting</u></p> <p>Please be aware the power station site is currently subject to two Pollution Prevention Control (PPC) permits, one for the combustion process and one for the ash lagoons. Both these permits will be revoked when the Environment Agency is satisfied that relevant environmental requirements have been met. It is not possible to outline these, at this time, because the operator has not yet applied to revoke the permits.</p> <p>The following comments are made in this context.</p>   | LDC & CCDC | Comments noted  |
| Environment Agency | <p><u>Flood Risk</u></p> <p>As discussed in paragraph 2.15 of the draft SPD the majority of the site is currently protected from flooding from the River Trent by the railway line embankment crossing the site on the northern side of the former power station and as such is shown as being in low risk Flood Zone 1. This is the sequentially preferable location for development in line with the NPPF approach to managing flood risk. The other side of the railway line is shown to lie within high risk Flood Zone 3, and is likely to be classified as Flood Zone 3b (functional floodplain). As such, in line with the NPPF, development should be limited within this area and we support the proposed retention of this land for use as a golf course / country park. It should be ensured there is no land raising within this area, as</p> | LDC & CCDC | Comments noted – the SPD will be expanded to take account of these issues                             |

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|  | <p>any such works would displace flood waters and increase flood risk elsewhere, in line with Cannock's adopted Policy CP16 (1g &amp; 3c) and Lichfield's adopted Policy CP3. Although the majority of the development area is shown outside the floodplain in Flood Zone 1, there are three areas of Flood Zone 2 (medium risk) on the 'landward' side of the railway as well as areas at risk of surface water flooding. This equates to land at 1 in 1000 year level of risk. It is likely that the removal of the embankment would significantly increase flood risk to the site from the River Trent, given the flat topography, which would severely limit the development potential of this land.</p> <p>In light of this it is imperative that a Flood Risk Assessment (FRA) is undertaken at the earliest opportunity to inform the site proposals, through an assessment of the extent to which this structure acts as a flood defence, and whether it needs to be retained and/or improved to allow the safe development of this site.</p> <p>Further to the above observations, flood risk should be acknowledged as a constraint to development in section 2.89 of the plan and a detailed consideration of fluvial (river) flood risk should be added to the Flood Risk &amp; Drainage section (Page 36) which currently largely focusses on surface drainage issues.</p> <p>Aside from the issue of the embankment, there is also potential for flood risk on site to be increased if the levels in the north-west corner of the site adjacent to the A51 and railway line are lowered. Our flood map currently shows the adjacent section of the A51 itself to be in high risk Flood Zone 3 and this could provide a flood flow route into the site. It is therefore questioned whether this area is capable of being reprofiled, and the SPD should flag the potential risks associated with this.</p> <p>It is currently not clear from the consultation document whether the railway embankment will be retained throughout the lifetime of the development. As discussed above, we advise that the SPD specifies that this feature remains, and that as part of this an assessment is carried out in order to establish the level of flood protection it currently provides and whether it is structurally sound and suitable for acting as a flood defence. It may also be necessary to obtain appropriate legal agreement from the owner of the embankment for it to be used for this purpose. The local authorities may</p> |  |  |
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|  | <p>wish to consider formally designating the embankment under Section 30 and Schedule 1 of the Flood and Water Management Act 2010. The purpose of this is to ensure that owners do not inadvertently damage or alter the embankment and increase flood risk. Once designated, anyone wishing to alter, remove or replace the embankment must seek prior consent from the designating authority. The Environment Agency would not look to adopt the structure as an ongoing flood defence, therefore arrangements will need to be put in place for regular inspections and maintenance to ensure the level of flood protection is maintained. If the railway is likely to be used in future, this will also need to be taken into account both in terms of impact on the structure acting as a flood defence and risk of flooding to the railway itself.</p> <p>The SPD should detail how a site-specific FRA will be required to determine the level of flood risk across the whole site from all sources, as well as any potential impacts off-site (both upstream and downstream), and how any risk can be mitigated. The SPD should detail the site-specific issues it should consider, including a requirement that pre-application discussions are undertaken with the Environment Agency, prior to any detailed proposals for the site development to be drawn up. It should be ensured that flood risk to third party land is not increased a result of the development, and that options are assessed as to the viability of the site providing flood alleviation benefits to the wider catchment. The effect of a range of flooding events should be considered, including extreme events on people and property.</p> <p>The FRA should include the following:</p> <ul style="list-style-type: none"> <li>• Hydraulic modelling to include flood outlines with and without the railway embankment. This shall take into account any existing channels, outfalls or other potential flow routes through the railway embankment.</li> <li>• The latest climate change allowances.</li> <li>• Should the modelling show that the embankment is integral to safe development of the site, an assessment of its structural integrity should be undertaken, and remedial measures identified where necessary, to ensure the development remains safe for its lifetime</li> <li>• The required height of the embankment to provide the necessary level of flood protection for residential development, taking account of climate change.</li> </ul> |  |  |
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|                    | <ul style="list-style-type: none"> <li>• An assessment of the impact on the site if the embankment is overtopped or breached (residual risk) and how this will be managed.</li> <li>• Potential mitigation measures including sequential site layout, floodplain compensation, raised floor levels etc. for the existing situation and any other scenarios.</li> <li>• Surface water management</li> </ul> <p>The Environment Agency will be able to supply existing model and LIDAR survey data to support this work.</p> <p>It must be made clear within the SPD that this assessment must be undertaken for the whole site at the earliest opportunity in order to inform any outline planning application. Subsequent mitigation measures or infrastructure required to make the site safe from flood risk must be completed prior to the commencement of any development. Any mitigation measures or flood risk management infrastructure required to make the site safe will need to be funded by the developer.</p> <p>No development should take place in the area between the railway embankment and the River Trent which is Flood Zone 3 and likely includes functional floodplain. The permanent retention of a continuous unobstructed area is an essential requirement for future maintenance of the river by the Environment Agency.</p> <p>Opportunities for flood risk reduction through the development of this site are limited, but the possibility of relocating the existing waste facility permitted under Staffordshire County Council reference CH.13/10/725 W at SK0516818289 (Land off Rugeley Eastern Bypass) should be explored to provide wider flood reduction benefits as part of this strategic development scheme.</p> |            |   |
| Environment Agency | <p><u>Ecology</u></p> <p>An ecological assessment should be submitted in support of the proposals in order to inform on the opportunities the development provides to improve the water-based habitat along the river Trent and the drains that flow through the site. The inflow and</p>  | LDC & CCDC | Comments noted - the SPD will be expanded to take account of these issues |

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|                    | <p>outflow channels to the river Trent within the site should be retained as they are currently functioning as fish refuge backwaters, and this should be protected. To improve the channel itself, gravel should be installed to promote fish spawning.</p> <p>The SPD should make it clear that culverting and building over of culverts on site should be avoided. Opportunities should be sought to open up any existing culverted watercourses on the site to alleviate flood risk, create and improve habitat and develop green corridors. Native riverside tree planting should be promoted.</p> <p>The river banks should be re-profiled in sections to create a sloping bank, and to increase access to the river corridor. The SPD should support connections between the elements of built development and the river in order to provide waterside recreation and a sense of ownership of the river. Consideration of how this could be achieved alongside the use as a golf course, and the physical barrier of the embankment should be addressed.</p>   |            |   |
| Environment Agency | <p><u>Environmental permitting regulations (EPR)</u><br/> This development may require Environmental Permits from the Environment Agency under the terms of the Environmental Permitting (England and Wales) (Amendment) (No. 2) Regulations 2016 for any proposed works or structures, in, under, over or within 8 metres of the top of the bank of designated ‘main rivers’. This was formerly called a Flood Defence Consent. Some activities are also now excluded or exempt. An environmental permit is in addition to and a separate process from obtaining planning permission. Further details and guidance are available on the GOV.UK website: <a href="https://www.gov.uk/guidance/flood-risk-activities-environmental-permits">https://www.gov.uk/guidance/flood-risk-activities-environmental-permits</a></p> <p>The local authorities will need to liaise with Staffordshire Council as lead Local Flood Authority regarding surface water management and watercourses other than main rivers (River Trent, Rising Brook). Given the proximity to the River Trent the water table is likely to be fairly close to ground level so drainage to ground may not be feasible.</p> | LDC & CCDC | Comments noted – reference to Environmental Permits will be incorporated into the SPD |

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| <p>Environment Agency</p>   | <p><u>Contaminated Land</u><br/> The following comments relate solely to the protection of ‘Controlled Waters’, matters relating to Human Health should be directed to the relevant department of the local council.</p> <p>The site is located in a sensitive location with respect to ‘Controlled Waters’ receptors being on Principal and Secondary A Aquifers, adjacent to the River Trent and crossed by several watercourses / drains.</p> <p>Given the previous use and extent of historic landfills underlying virtually the entire development area, investigation into the presence of contamination is going to be required. There may be areas that haven’t been subject to previous significant development (including historic landfills) but these are likely to be few and far between.</p> <p>With reference to paragraph 2.68 it is unclear who agreed that there is no requirement for remediation of the former Coal Stock Yard. It may be that these comments relate only to Human Health receptors and haven’t considered ‘Controlled Waters’. The Environment Agency would want to see further justification of this approach.</p> | <p>LDC &amp; CCDC</p> | <p>Comments noted – the SPD will be expanded to take account of these issues</p> |
| <p>Fogarty S / Taroni S</p> | <p>Our idea is for a "Boaters island" to be created from the Canal near by Spode with a viaduct over the Armitage road this would create a small canal arm up through the power station site or alongside it ,leading up to a"Boaters island" which would have a cafe on it and shop /boat facilities with short stop mooring so all tourist could use it say on an overnight ticket basis it would allow the boaters to go around it in one direction and exit back out onto the existing canal. Possibility of creating some new jobs and a tourist destination much needed facilities as there are currently about a twelve mile gap from Rugeley East to west of the canal this could be something along the lines of the ponycillte site or birminghams Brindley place in the heart of Cannock chase /Rugeley/Lichfield .</p>  | <p>CCDC</p>           | <p>Comments noted</p>  |
| <p>French P</p>             | <p>I suggest that suitable uses for the power station site would include: more private housing, a school, a community centre, and no more than a convenience store for local inhabitants. All these would blend well with the very pleasant riverside location. There should be more trees to screen the Amazon warehouse from the new development.</p>   | <p>CCDC</p>           | <p>Comments noted</p>  |

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|                  | <p>I consider that unsuitable uses for the site would include: more high volume warehousing, an out of town retail park or large super market that would suck more life blood out of our town centre. More industrial units are also unnecessary, there is still ample space for more such units on the site of the old colliery.</p>  |            |   |
| Garner D&G       | <p>I support there being development in this particular area as it is a 'Brownfield Site' - were it a 'Greenfield Site' then I would be opposed to the proposed development/s. The definition of Rugeley Town Centre being close to the proposed development site can be considered in many different ways. As Rugeley Town Centre is suffering from a lack of interest and appropriate investments by all the Local Authorities and thus the results are a shortage of businesses and jobs, etc. The directions to it should be displayed at as many points as possible including a 'Bus Route' and provision of a 'Taxi Rank', etc. etc. within the development not nearby.</p> <p>The present 'Social Club' and 'Leisure Facilities' and 'Allotments' should be adapted to meet the needs of the community created by the development BUT WITHOUT TAKING AWAY/REDUCING THE USE OF THE RUGELEY LEISURE CENTRE AND OTHER EXISTING PROVIDERS WITHIN THE LOCAL AREA, ETC.</p> <p>Trees should be planted and the appropriate landscapes created as part of the development to enhance the former industrial area, etc.</p> <p>The proposal for more 'Education Facilities' as part of the development are not required as the present/existing 'Education Facilities' within Rugeley - Brereton - Armitage are sufficient and if the need for more places at those are proved to be necessary then - those present Schools and Academies - should be enlarged and the present provision of transport to them enhanced.</p> <p>As far as the proposed 'Housing Development' is concerned I see 'no problems' with that as long as access to - and the use of - Rugeley Town Centre is improved/increased resulting in it becoming a more enhanced and used place, etc., etc.</p> | CCDC       | Comments noted  |
| Highways England | <p>Rugeley is well served by public transport linking it to the rest of Staffordshire, the wider region and beyond. The town is host to a large bus interchange with services to Stafford, Lichfield, Uttoxeter, Cannock, Walsall and Wolverhampton, as well as two railway stations on two major mainline railways; the West Coast Mainline between London Euston, Manchester, Liverpool, Preston and Glasgow, and the Cannock Chase Line which heads south to Walsall and eventually Birmingham New Street.</p>  | LDC & CCDC | Comments noted – the requirement for a Transport Assessment will be included within the SPD |

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|  | <p>Public transport for both modes is relatively frequent, with bus services operating regularly to key destinations, an hourly rail service towards London and a half-hourly service towards Birmingham via Walsall. Electrification of the Rugeley to Cannock rail-line by 2018 will reduce journey times to Walsall and Birmingham.</p> <p>The former power station entrance is to be repurposed as the main access point for the development, which is within reasonable distance and walking time of the following public transport connections:</p> <p>Rugeley Trent Valley station: 1 mile – 20mins; Rugeley Town station: 0.5 miles – 12mins ; Rugeley Bus Station: 0.8 miles – 15mins</p> <p>Rugeley Town station and the Bus Station fall within 15 minutes walking distance, providing public transport connections to the development.</p> <p>The objectives outlined in the Draft SPD support further possible regeneration within the Rugeley area in response to the creation of the new site. With the construction of more than 10,000 homes immediately to the east of the town centre, large amounts of infrastructure and services will have to be upgraded to accommodate this new population. Highways England supports the regeneration of district centres as a sustainable manner of bringing development forward, potentially reducing the need to travel to access services and employment opportunities for local citizens.</p> <p>Further to supporting the regeneration and development of the Rugeley area, the Draft SPD also outlines sustainable travel and development practices in order to maintain its environmental awareness. The objectives are welcomed as part of a sustainable approach to mobility, reducing the need to travel and promoting the use of alternative modes.</p> <p>The closest parts of the SRN include M6 Junction 13 (11.6 miles), M6 Toll Junction 7 (9.1 miles), the A5 (9.1 miles), the A38 (8.7 miles) and the A50 (14 miles). In average traffic conditions, each of these can be reached within 20 to 25 minutes.</p> <p>Despite the relative distance of the SRN from the development site, Highways England considers that due to the scale of development being proposed, there could be some impacts on the operation of the network. Therefore we would expect that a Transport Assessment will be carried out in order to better understand the impacts and we would wish to be engaged in its review.</p> <p><b>Conclusion</b><br/>Rugeley is not located near to any part of the SRN, however due to the scale of</p> |  |  |
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|                            | development being proposed, there could be some impacts which should be better understood through the undertaking of a Transport Assessment.   |            |  |
| Homes & Communities Agency | <p>The HCA supports the approach taken within the SPD to the redevelopment of the site, and the positive approach to joint working demonstrated by CCDC and LDC.</p> <p>The recognition of the site's capability to accommodate a significant amount of much needed new housing is welcomed. In particular, the confirmation that the predominant use of the site will be residential with employment, commercial, retail, leisure and community uses is also encouraged. The HCA consider the identified 'blend' on uses to be entirely appropriate for the delivery of a sustainable urban extension to Rugeley, which maximises the re-use of brownfield land.</p>                    | LDC & CCDC | Comments noted   |
| Homes & Communities Agency | <p>The HCA consider setting a minimum limit for housing is entirely appropriate and recommend that further clarification is provided regarding the minimum level of provision. Specifically, the SPD should make clear that the minimum of 800 new homes is in addition to the extant planning permissions and site allocations on the site. Furthermore, the SPD should clarify that some residential development on the site is likely to be delivered beyond the current Plan Period to 2029 and that this housing would be in addition to the minimum threshold set. In doing so it is important for the SPD to provide guidance for development beyond the current plan period.</p> | LDC & CCDC | Due to the level of information available to date, the provision of a minimum of 800 dwelling relates to development within Lichfield District Council only. |
| Homes & Communities Agency | <p>The HCA recognises the site has significant constraints, as well as opportunities and welcomes the encouragement contained within the SPD for the retention of key elements of the site as part of its future redevelopment. In order to ensure the SPD does not unduly delay the delivery of this key site and to make the policy more precise, the HCA recommend that further clarification is provided regarding the level of information required and methodology for considering the future potential of the existing rail freight connection.</p>   | LDC & CCDC | The rail connection is an opportunity which will be subject of further discussions as the development progresses.  |
| Homes & Communities Agency | <p>The HCA supports the approach taken to the delivery of Affordable Housing, and the recognition that whilst both LDC and CCDC have differing Affordable Housing Policy Requirements (subject to viability), the provision of affordable housing across the site will be subject to further negotiation with the Local Authorities.</p>   | LDC & CCDC | Comments noted   |

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| Homes & Communities Agency | The HCA recommend that the SPD provides clarity on how Vacant Building Credit could be applied to the redevelopment of the site. This should be provided alongside the guidance on Community Infrastructure Levy (CIL) and developer contributions.  | LDC & CCDC | Vacant Building Credit will be applied in line with legal requirements                                |
| Johnson, R                 | As a former City Planner from Santa Barbara, California (current resident of Hednesford) I strongly support the proposal to bring a high-tech development into the former Rugeley power station site.<br>Tech talent would be very attracted to this area for its outstanding recreation in Cannock Chase forest, quick public transit to Birmingham for city amenities, and diverse & affordable local housing stock. Our area deserves this chance to become something bigger and greater.   | CCDC       | Comments noted  |
| Jones, G                   | Please ensure facilities that include a school and a Doctor' surgery.  | CCDC       | Comments noted – infrastructure requirements will be considered further as the development progresses |
| Jones T                    | Thank you for consulting on this important draft SPD. I support in principle the redevelopment of this site for a mixture of uses, recognising that the alternative is likely to be development of greenfield land. I am however concerned that the full cost of infrastructure is met by section 106 deeds of planning obligation, Community Infrastructure Levy, or both. This includes (but is not limited to) schools, health provision, buses and policing and Brereton and Ravenhill Parish Council's provision of allotments and parish hall. With local primary schools at capacity, a new primary school is needed. I therefore welcome the references to provision of a primary school in paragraph 2.89's fifth indent and in paragraphs 3.32 and 4.16. | CCDC       | Comments noted  |
| Jones T                    | With the proximity of the site to the A51 and the West Coast Mainline (which in this location will in future carry those high-speed trains that serve Stafford), care will be needed to ensure that buildings (residential, employment and other) have good sound insulation.  | CCDC       | Comments noted  |
| Jones T                    | We need employment provision, not least to facilitate businesses moving from Redbrook Lane and to prevent a repeat of the loss of JCB from the Rugeley and Brereton and Ravenhill area. Efforts should be made to preserve the private rail siding (paragraph 2.11) for use in connection with the proposed employment development. I therefore welcome paragraph 4.27 and the final sentences of paragraphs 4.11 and 4.45.  | CCDC       | Comments noted  |

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| Jones T   | In order to reduce car dependency, there needs to be the employment provision mentioned above and a network of pedestrian and cycle routes. These should link with the canal towpath, which should be improved, so that it is usable by and attractive to people with pushchairs, disabled people (including those in wheelchairs) and cyclists. The inadequacy of the towpath in these respects and its need for improvement should be recognised, perhaps in paragraph 2.32. | CCDC | Comments noted – references to tow paths will be considered in relation to the wider site context        |
| Jones T   | The absence of any mention of London in paragraph 2.33 is most surprising and suggests that the most up-to-date information may not have been used in preparation of the SPD.  | CCDC | Comments noted – SPD will be amended   |
| Jones T   | The impact of the southern part of the site on the almost adjoining Trent and Mersey Canal Conservation will require careful consideration. Paragraph 2.18 should be expanded and strengthened to reflect this. Paragraph 2.25 is wrong. The Canal Conservation Area with its 18th-century canal and towpath is unquestionably a heritage asset. The draft should be amended to reflect this.  | CCDC | Comments noted – Comments noted – Reference to Conservation and Heritage will be strengthened in the SPD |
| Jones T   | “Council’s” in paragraph 2.49 should read “Councils”.  | CCDC | To be amended  |
| Jones T   | I am concerned that paragraph 2.52 could facilitate too easy a removal of trees. It should make clear that this should only happen if fully justified by appropriate expert evidence.  | CCDC | Comments noted – Paragraph 2.52 to be strengthened   |
| Jones T   | “Rugeley Train Station” in paragraph 2.81 should read “Rugeley Town Station  | CCDC | To be amended  |
| Jones T   | Figure 2.10 should include the following (which are at present omitted): Brereton and Ravenhill Parish Hall in Ravenhill Park; Newman Grove allotments, Ravenhill; Brereton Methodist church on Brereton Main Road; and the Co-op supermarket in Redbrook Lane.  | CCDC | Comments noted – SPD to be updated to take account of these comments                                     |
| Jones T   | I welcome the references to “Opportunity to create country park/wildlife corridor” in figure 2.14 and the corresponding annotation in figure 4.4. Despite the proximity to the River Trent of the Rugeley and Brereton and Ravenhill built-up area, there is, at present, hardly any opportunity for local people to enjoy the river.  | CCDC | Comments noted   |
| Jones T   | I am aware of the current CIL rates and hopes that these will be extended to betting shops and other premises where substantial gambling takes place.  | CCDC | CIL rates have been set at examination   |
| Kettle, M | I fully support the development of this site. I believe the proposals are for a mixed use of housing, employment land, open space and recreation facility ( <b>Page 3 paragraph 1.5</b> ).   | CCDC | Comments noted   |

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|           | Roughly 1/3 of the proposed area falls within Cannock Chase District Council and is proposed as employment land/provision. The remaining 2/3 of the proposed area within Lichfield District Council for housing. However I would like to see more of the employment land/ provision available within the given area. Recently, Rugeley was unable to provide a larger suitable site for one of the major employers in the town, JCB. This has led regrettably to JCB making a decision to close their operations in Rugeley and to move their employees and the work out of the area. We do need employment opportunities locally however a mix of small and larger businesses. |      |   |
| Kettle, M | The site needs to have a balance between housing and employment so that people do not have to travel too far out of the area to work. P33 paragraph 4.18 'to create a sustainable development which reduces car dependency..'   | CCDC | Comments noted  |
| Kettle, M | Page 3 paragraph 1.5 If residential development is proposed we need accommodation of mixed type houses, bungalows, sheltered accommodation. The occupants of the new houses will need services. The existing schools in the area could not accommodate the additional school places that are needed so there would be a need for a new school to be built. It maybe that additional doctors, health centres are needed as the existing provision within the area is already strained.   | CCDC | Comments noted  |
| Kettle, M | Pages 11, 12 (paragraphs 2.27 – 2.34) The site will need improved transport and access routes. Roads, bus routes, pedestrian and cycle routes and access routes to the railway stations of Rugeley Town station and Trent Valley station. The employees of the large Amazon site that commute via bus and train often have to walk from the station some distance to reach the warehouse, many use the canal towpath to cut across to Amazon warehouse. This provides a pleasant route to the warehouse but the towpaths do require regular maintenance.  | CCDC | Comments noted – infrastructure requirements will be considered further as the development progresses |
| Kettle, M | Page 10 paragraph 2.21 The retention of sub stations in situ, rights of way to substations and adjoining land need to be carefully considered as this may affect the suitability of the use of the land.  | CCDC | Comments noted  |
| Kettle, M | The proposals mention that no conservation area is affected however if housing is proposed this may run adjacent to the Trent and Mersey canal, which is within a conservation area. <b>(page 9 paragraph 2.18) (Page 11 paragraph 2.24)</b> Carefully consideration to this area was given with the development of the Pippins housing development.  | CCDC | Comments noted – Reference to Conservation and Heritage will be strengthened in the SPD               |

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|  | <p>The links below shows maps of the area during the period 1885 – 1952 prior to the development of the site as a Power Station.</p> <p><a href="http://maps.nls.uk/view/102347345">http://maps.nls.uk/view/102347345</a> 1924 map<br/> <a href="http://maps.nls.uk/view/101596823">http://maps.nls.uk/view/101596823</a> 1885 map<br/> <a href="http://maps.nls.uk/view/101596820">http://maps.nls.uk/view/101596820</a> 1902 map<br/> <a href="http://maps.nls.uk/view/101596814">http://maps.nls.uk/view/101596814</a> 1948 map<br/> <a href="http://maps.nls.uk/view/91792632">http://maps.nls.uk/view/91792632</a> 1952 map</p>  |             |   |
| <p>KGL Estates<br/>(Agent:<br/>Heminsley, J)</p> | <p><b>1. Context in relation to Local Plan Part 2</b></p> <p>1.1 Representations have been made on behalf of KGL Estates in relation to the potential of land south of the A5190 Cannock Road Heath Hayes to meet part of the District’s housing land requirements in the context of the contribution required to meet Birmingham’s needs during the current plan period and to safeguard land for future housing development post 2028.</p> <p>1.2 The future contribution to housing land requirements which could be made at Rugeley Power Station were referred to in the consultation on Local Plan Part 2, which took place earlier in the year. The contents of the report to Cabinet on 24/07/2017 concerning the outcomes of the consultation and the proposed next steps are noted.</p> <p>1.3 The comments below are made in the context of these previous representations.</p> <p><b>2. Representations on the Draft Development Brief</b></p> <p>2.1 It is noted that the area covered by the brief includes land in both Cannock Chase District (CCC) and Lichfield District (LDC).</p> <p>2.2 The overall proposals for a mixed use development comprising housing, employment, education, open space and recreation uses are supported as providing an appropriate approach to future development of the site, potentially enabling Rugeley to continue to function as a sustainable settlement which includes a range of employment opportunities for its residents.</p> <p>2.3 The practicalities of the need to retain some existing electricity and rail infrastructure on the site and the relationship with existing housing developments adjoining the site and open space uses on the site has led the proposed distribution of</p> | <p>CCDC</p> | <p>Comments noted – these comments will be the subject of further discussions between the LDC and CCDC.</p> <p>Please see response to Cannock Chase Local Plan Part 2 on matters relating to Birmingham shortfall</p> |

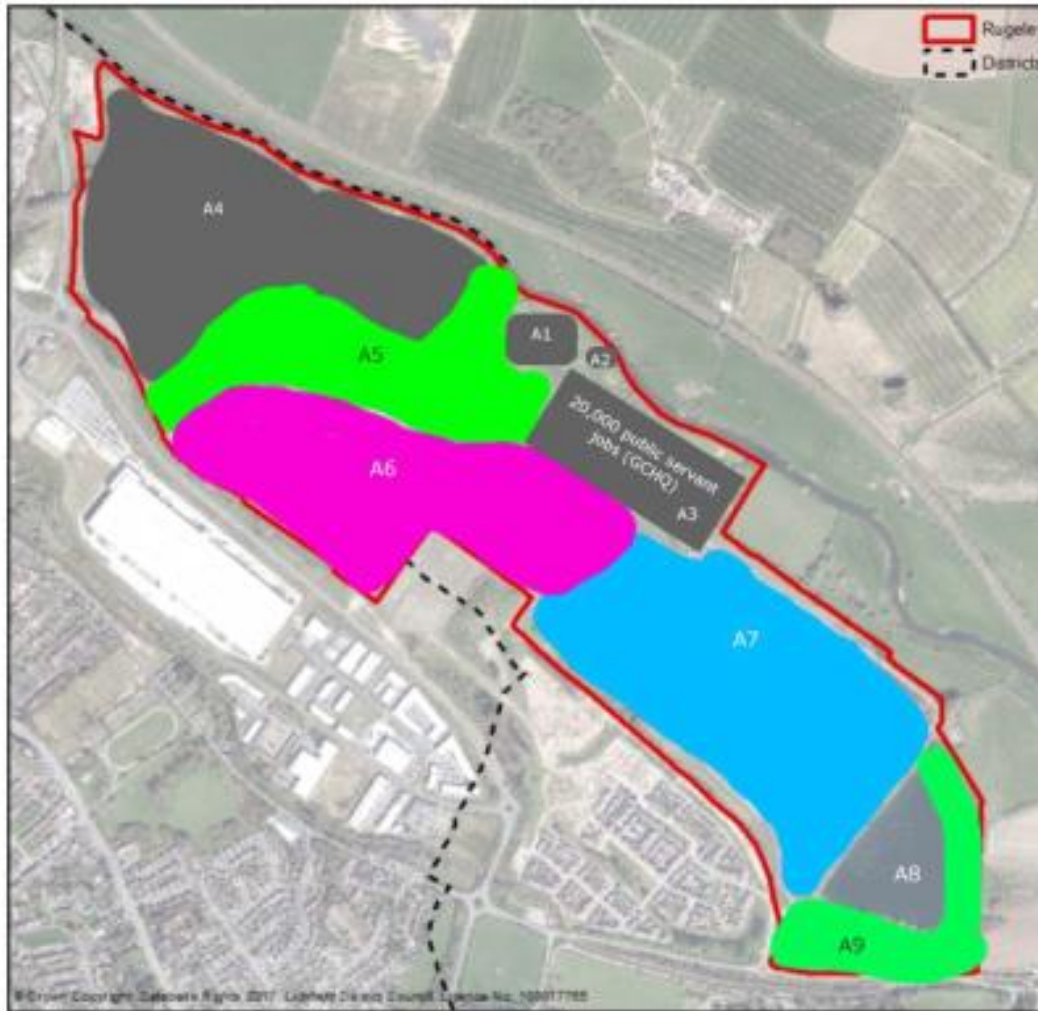
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|  | <p>future land uses to focus on employment provision on the CCC land. This approach is supported. However the consequence of this is that the site will not make a contribution towards meeting Rugeley’s future housing needs unless a further agreement is reached between the two Councils.</p> <p>2.4 The current adopted Local Plan Policies across the two Councils is understood to be as follows –</p> <ul style="list-style-type: none"> <li>• The adopted CCC Plan requires delivery of 5800 dwellings to 2028 of which 500 are to be provided on land in LDC east of Brereton in order to meet Rugeley/Brereton’s needs.</li> <li>• The adopted LDC Plan proposed 10,030 dwellings up to 2029 including the 500 for Rugeley as part of a strategic allocation of 1,125 dwellings east of Brereton.</li> </ul> <p>2.5 LDC’s Site Allocations Plan indicates that a minimum of 800 dwellings to be completed east of Brereton by 2029. The overall capacity of sites currently with permission is around 650 and these are either built or under construction. The LDC allocation in the adopted Local Plan assumes that 450 units will be built on the site of the former borrow pit, east of the current housing development site. It is noted that the Draft Development Brief now proposes to retain this water body as a nature conservation/recreation site. As the housing proposals in the Brief indicate a capacity of 800 units entirely within LDC, this means that the net increase in capacity achievable, if the proposals in the brief are followed, would only be 350 units.</p> <p>2.6 It is noted that CCC is not attributing any housing numbers to be delivered on land within the District. LDC expect all the proposed 800 to be completed by 2029. This latter conclusion is questionable, because the land identified for housing development in the Brief mostly comprises existing or partially reclaimed ash lagoons and it is acknowledged that further information is needed on remediation requirements before development can commence on this land. The initial demolition programme is not expected to be completed until 2020. So this fact, together with the uncertain extent of remediation required to deliver housing on the site, makes it very unlikely that more than 500 completions could be achieved by 2029. Construction of 50 units per year, the normal development rate on major housing sites, would only realise 450 units if development actually commenced in 2020. The net increase in units during the current LDC plan period, taking account of the loss of the borrow pit site, would therefore only likely to be 100 to 150 units.</p> |  |  |
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|            | <p>2.7 Clearly a further agreement between the two Councils would be required if any of the proposed dwellings are to be counted as contributing to housing requirements within Cannock Chase District.</p> <p>3. <b>Conclusions</b></p> <p>3.1 Rugeley Power Station provides a major brownfield development opportunity and the focus on mixed uses is considered to be the right one in the interests of the sustainability of Rugeley/Brereton as a whole.</p> <p>3.2 The proposal to retain the former borrow pit as a nature conservation/recreation resource is appropriate, but the consequence of this is that the net increase in housing which the site can deliver is limited. It is inevitable that some of the housing delivery will take place beyond the current CCC plan period ending 2028 and the LDC plan period ending 2029. If any of these limited numbers, over and above the 500 already counted in the adopted Local Plans, are to support local housing need in Rugeley, a further agreement between the two Councils will be required.</p> <p>3.3 Both Cannock Chase Council and Lichfield District Council are expected to contribute to meeting Birmingham’s housing requirements as well as their own locally generated need. The redevelopment of Rugeley Power Station can only make a very minor contribution to future local or regional housing needs and therefore the validity of the arguments for release of the land south of Cannock Road put forward in connection with the consultation on Cannock Chase Local Plan Part 2 Issues and Options document remain unaltered.</p> |      |  |
| Lawrence R | <p>I have read, with interest, the many articles over the last few months regarding the closure and proposed redevelopment of Rugeley Power Station. Recently there have been a few articles in the press quoting a 'third party developer' and those comments by Amanda Milling MP.</p> <p>The development of this site is a once in a lifetime opportunity, proper redevelopment will put Cannock and Rugeley on a solid footing, developing into the future, poor redevelopment will simply destroy the area.</p> <p>In my view, the site is vital to the local, regional and national infrastructure and needs to have the right approach, the development needs to include:</p> <p>High tech Industry<br/>Housing designed and developed to create a community</p>  | CCDC | Comments noted – the SPD aims to create a balanced and sustainable community. The SPD is flexible to enable development to come forward and will be the subject of further discussion as more information becomes available. |

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|               | <p>The integration of the site into Rugeley and Cannock, offering facilities unavailable elsewhere</p> <p>A school (given the size of the proposed development)</p> <p>Entertainment and leisure facilities</p> <p>The proper landscaping and ecological development of the site</p> <p>Enhancing the road, walkways and cycle paths for the region</p> <p>A certain level of power generation on site</p> <p>Developing with a view to the future, e.g. the 2040 ban on non-electric vehicles</p> <p>Taking this route would create a shining jewel for the region, would enhance the reputation of the Councils and provide high paid jobs with prospects (replacing the loss of business rates from the Power Station, many fold)</p> <p>The alternate (as is intimated in the Supplementary planning Document), looks like a massive, cookie cutter approach to housing, with no attempt at developing a community (as per the current Persimmons development next to the site), and a distribution centre, offering zero hour, minimum pay jobs. This approach would destroy the local economy and, to be honest, I can't think of an approach that would actually do more damage (even leaving the site undeveloped would be better).</p> <p>From what I can extrapolate from the recent articles in the press, the 'third party developer' approach seems to be one that offers a visionary, somewhat radical approach, one that proposes the best for the site and for the community as a whole.</p> |      |  |
| Marston J & S | <ol style="list-style-type: none"> <li>1. Given that most developments in our area have been at the luxurious end of the market we believe that any application should ensure that there is a fair amount of affordable housing, this would enable residents families could purchase there own properties.</li> <li>2. Given the bad press and Government concerns relating to the abuse of Leasehold properties, we believe any application should only contain Freehold properties.</li> <li>3. Would it be possible to insist that some of the lost Leisure facilities including fishing, golf etc, could be reinstated within the site.</li> <li>4. Given that we live in an area of Outstanding Natural beauty, would it be possible to insist that wooded type areas around the site, to blend in with the local landscape.</li> <li>5. Given that this site already has access for rail freight, we believe that this could be turned into a public right of way, with pedestrian access to Trent Valley Station or Rugeley town station or both.</li> </ol>  | CCDC | Comments noted – these issues will be considered further where they are within the scope of the planning system. |



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| <p>Mayo M</p> | <p>It is my view that the land that is due for redevelopment at the former Rugeley B power station site could be better utilised in several ways which will not only serve the local area but would help the nation as a whole.</p> <p>It is my proposal that the site is the ideal location for a new data communications GCHQ subsidiary facility specifically due to the location of the Rugeley power station B site being in direct line-of-site view to the nations concrete tower military microwave communications network (codenamed: backbone). A new concrete microwave tower located on the map at A2 would link directly into the backbone network connecting all military bases around the UK. A new small satellite field located at A1 on the attached image would also help to serve this location.</p> <p>The building at A3 would rival the current building occupied by Amazon in rugeley, this building would employ up to 20,000 highly skilled civil servants linked to british intelligence/GCHQ/British Army. Staffordshire is at the heart of the British military forces, it has a long established role, Rugeley is a Centralised area of Staffordshire, it is the ideal location to build such a facility.</p> <p>The facility would be supplied with a highly skilled workforce. The main bulk of public servants who come from Staffordshire but travel long distances to other British intelligence linked facilities in areas such as Portsmouth, Cardiff, Cheltenham, Gloucester, London to name a few, would be able to board private civil service worker trains from along the north/south west coast mainline (Stafford, stone, Stoke-on-trent/Lichfield, tamworth, atherstone, nuneton, rugby) and from along the chase line (hednesford, Cannock, Walsall, Birmingham), with the use of the existing rail-line connecting the chase-line to rugeley power station B site being utilised by the new facility, the rail-line could also be used by another proposed part of the site proposed use by pentaver at location A4 on the attached image.</p> | <p>CCDC</p> | <p>Comments noted – the nature of any employment uses will be considered further as the development progresses.</p> |
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The site at A4 would be ideal to connect Amazon Swansea to Amazon Rugeley, via a direct access rail link. If pentalver were to build at that location with direct connection

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|                | <p>to the chase-line then we would see more jobs coming to Rugeley. This would add more jobs along the chase-line in the long term, possibly leading to the development of an actual Cannock Chase railway station being developed right at the heart of the chase around the area of the rail crossing located on the bottom of Marquis Drive/Hednesford Road, which would serve the chase area.</p> <p>I hope you see the full potential of these proposals listed below.</p> <p>A1 - proposed satellite field.<br/> A2 – New Microwave Tower – direct line of site link to Pye Green military/BT tower (backbone military communications network).<br/> A3 – New building to house 20,000 public servants who specialise in CyberSecurity, Cryptography, GCHQ.<br/> A4 – Pentvaler rail freight forwarder.<br/> A5 – New recreational facility with large park, ice rink, skate park etc.<br/> A6 – Large Retail park with underground parking.<br/> A7 – Large housing estate complete with own recreational Lake &amp; park A8/A9</p>   |      |                |
| Milling A (MP) | <p>Since the closure of the power station I have consistently called for an ambitious, bold and visionary plan for the redevelopment of the site. This is a large strategic site both to the district as well as the West Midlands region with excellent connectivity to the National Grid, rail infrastructure and fibre optic broadband. The redevelopment has the potential to add significant economic value to the Rugeley area, Staffordshire and the West Midlands. The redevelopment provides an opportunity to take account of the growth in new industries and sectors of growth, especially given the infrastructure that already exists. It is essential that the redevelopment attracts innovative, high tech and advanced manufacturing businesses that create high skilled and highly paid jobs for residents. Indeed the development is a once in a generation opportunity to create a prosperous future for Rugeley and the Cannock Chase district as well as the springboard for the regeneration of Rugeley Town Centre.</p> <p>There are various sites across the West Midlands which provide examples of what could be achieved in terms of attracting businesses of this nature, for instance the i54 site in South Staffordshire home to Jaguar Land Rover; the Longbridge Technology Park, which was known as the birthplace of the Mini, and is now undergoing a major regeneration</p> | CCDC | Comments noted |

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|                | scheme which will see thousands of new jobs and will be a leading centre for technology and innovation.   |      |   |
| Milling A (MP) | <p><b>Mixed use Development</b></p> <p>Support in principle the aim that the site should be used for a <i>'well designed'</i> mixed use development which includes provision for education, open space, recreational facilities, housing and employment. The Longbridge site is a good example of a fully mixed model, with the Technology park, new homes, a leisure and retail offer, conference facilities and hotel accommodation.</p>  | CCDC | Comments noted  |
| Milling A (MP) | <p><b>Housing</b></p> <p>In principle, support the concept that some of the site should be allocated to housing provision although it will be essential that there is sufficient provision of the infrastructure, local services and amenities such as local transport, schools, GPs and shops to support the increase in new residents to Rugeley. A housing development of this scale could put further strain on already stretched services so it is imperative that the plans build in the additional infrastructure, public services and local amenities to support the population increase.</p> <p>Figure 22 outlines the design parameters and I support the proposed situation of the residential land. I note that this land falls under Lichfield District Council but I am of the firm view that it should be Brereton and Ravenhill and Rugeley's infrastructure, public service provision and amenities that should be bolstered to support the development.</p> | CCDC | Comments noted – infrastructure requirements will be considered further as the development progresses. Services and facilities assessment work is underway. |
| Milling A (MP) | <p><b>Leisure and Recreational Facilities</b></p> <p>The Power Station site has, historically, been home to a Social Club and numerous sports and leisure facilities and groups. The closure of the Power Station and the resulting closure of the Club and these facilities has had a significant impact on the town, its residents and the available sports and leisure provision. Re-homing the various clubs and community groups has been one of the biggest challenges over the last 12 months. As such, it is essential that the site's redevelopment sees this leisure and recreational provision replaced in full. Given the additional housing being proposed, this provision should actually be enhanced. As such, I support the inclusion of Community Hub, Recreational Facilities and open Space as outlined in the plans and agree to where they would be situated as outlined in Figure 22, The Design Parameters.</p>  | CCDC | Comments  |

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| <p>Milling A (MP)</p> | <p><b>Employment</b></p> <p>As set out in the introduction, this is, in my view the most critical aspect of the policy plans. A strategic plan should be set out which will ensure the employment provision attracts business that will bring highly skilled and paid jobs to Rugeley, Cannock Chase District, Staffordshire and the West Midlands region.</p> <p>I currently do not believe that the current policy goes far enough in terms of realising the employment potential for the site. As I have set out, I believe we should be setting out a plan which will attract high tech, digital and advanced manufacturing businesses. Currently, the policy document omits the connectivity to the fibre optic broadband network. Indeed the site is located adjacent to two of the main lines which form part of the UKs fibre optic backbone. These lines run alongside the canal network and along the west Coast Main Line. I strongly believe that there is a role for the sites development to leverage the proximity to this infrastructure. Indeed I believe this site would be ideally placed to home a Science / Technology Park given the infrastructure – National Grid, fibre optic broadband and rail network with access to both the Chase Line (to and from Birmingham City centre) and the West Coast Mainline (to and from London and the North).</p> <p>In contrast I feel that the policy document overstates the road network connectivity. The road network to the site is not within the direct vicinity of a motorway. It should be noted that Rugeley is some distance from the motorway network in contrast to the Kingswood Lakeside Business Park in Cannock which is in very close proximity to both the M6 and the M6 Toll Road. In fact, from the Rugeley Power Station site the motorway network can only be accessed via single carriageway A roads through towns and cities including Rugeley itself, Cannock, Stafford and Lichfield. These roads already incur extensive HGV traffic by virtue of other businesses in the area. Further to this, Rugeley is suffering from a shortage of HGV parking facilities which has seen local residents and businesses suffering from HGV fly-parking on streets and business parks. The town is ill equipped to cope with additional HGV traffic both in terms of the road network and the facilities for HGVs. Serious care and consideration needs to be given to the redevelopment of the site, as it is the town and local infrastructure could not support more warehouses and distribution centres.</p> <p>I feel that the planning policy document in its current form is in danger of homing businesses that offer low skilled employment, such as warehouses and ‘standard’</p> | <p>CCDC</p> | <p>Comments noted – the SPD will be strengthened in the context of these issues.</p> <p>With regards to transport concerns, a Transport Assessment will be required as part of a planning application to take account of these issues.</p> <p>The Councils will be encouraging high quality end uses. The SPD will be adopted in accordance with Cannock Chase LLP1 Policy CP9 which encourages high quality employment uses.</p> |
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|                | <p>businesses units which are already in plentiful supply. Not only is there the danger that more warehouses and distribution centres will simply create low skilled jobs but also exacerbate the issue of HGV traffic and HGV fly-parking in and around Rugeley. In summary, the site offers the opportunity to build a strong local economy and sustainable economic growth(in line with the NPPF) attracting significant investment and create an employment footprint leading to high skilled and high paid jobs. Anything less would be selling short the future of Rugeley and the wider area.</p>   |      |   |
| Milling A (MP) | <p><b>Mixed use land</b><br/>Rugeley is currently lacking in significant leisure / entertainment provision (eg cinema, bowling alley, ice skating etc) and has limited hotel accommodation, restaurants etc. I believe that provision of this nature should be considered.</p>   | CCDC | Comments noted although these will be considered in the context of Rugeley Town Centre as this site must not undermine the vitality of Rugeley Town Centre in line with Rugeley Area Action Plan.   |
| Milling A (MP) | <p><b>Other considerations</b><br/>Strategic Development Plan for Rugeley<br/>The planning policy document fails to take into account any other development land which will be available as a result of the flood defence work which is being undertaken in Rugeley and the relocation of JCB cab systems (opposite the power station on Power Station Road). These additional sites should be factored into the development plan as they provide an opportunity or strategic redevelopment plan for Rugeley. The sites should be mentioned in the document and then taken into account as part of the planning policy document. These other sites increase the redevelopment footprint.</p>   | CCDC | SPD focuses specifically on Rugeley Power Station Site. Other issues will be considered through Cannock Chase LLP2.   |
| Milling A (MP) | <p><b>Developer contributions</b><br/>I believe there needs to be a robust policy in place for the contributions by developers. I would urge the Council to ensure developer contributions are focused on improving the facilities in Brereton&amp; Ravenhill and Rugeley. Once the flood defence scheme has been completed in Rugeley there will be the opportunity to regenerate Rugeley Town Centre. A town centre investment strategy should be established with a greater focus on the redevelopment of the Power Station site releasing funding from developer contributions for wider town centre investment and to increase the leisure and entertainment facilities on offer. The possibility of retail development on the power station site should, I believe, be limited to convenience services. The use of the exiting</p> | CCDC | The SPD compliments the adopted Local Plan Part 1 and Rugeley Area Action Plan (CCDC) and Local Plan Strategy (LDC) which are both supported by an Infrastructure Delivery Plan. This is being updated as part of the ongoing work in relation to this SPD and Local Plan Part 2 (CCDC) and Local Plan Allocations (LDC). |

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|                 | town centre should be promoted as a main shopping destination for the residents of the new housing development on the site, thus increasing the town centre economy. Cannock Chase District Council and Lichfield District Council should have a formal agreement between themselves to ensure any developer contributions that would be received by Lichfield District Council are either passed to Cannock Chase District Council or Cannock Chase District Council are empowered to decide on how these contributions are spent. Contributions received by Lichfield District Council should not be spent on schemes that are outside the immediate Rugeley area. |      | It is agreed retail development should be limited to local service centre so as not to undermine the vitality of Rugeley town centre.<br><br>Any development contributions towards infrastructure delivery will be the subject of further discussions between two Councils. |
| Molineux S      | I think no more houses are needed at this time in Rugeley as the growth is good at the moment but what's needed is jobs and more things for families and younger people to do i.e. Shopping and amusements maybe you should try and make Rugeley better rather than filling it with houses and drowning the town with people and not giving what is needed more doctors schools shops and JOBS hope this actually gets read thank you  | CCDC | Comments noted – infrastructure issues will be considered to align with the development on the site   |
| Moulton S       | I think it is good that the land is being used for more than just housing. HOWEVER, I you cannot build another 800 houses unless you have built another health centre / doctors. Sandy Lane Doctors is already over used as well as most in the area, so there is a real need for another health centre in the area if these houses are being built.   | CCDC | Comments noted - infrastructure requirements will be considered further as the development progresses.  |
| Natural England | Natural England welcomes this Supplementary Planning Document (SPD). In view of the former power station site's scale and location this shared local planning authority SPD offers a valuable opportunity to guide development in such a way that the scheme's design achieves optimum, positive social, economic and environmental outcomes. In particular we would emphasise the synergies offered by the site's redevelopment in terms of landscape, biodiversity, surface water drainage, open/greenspace and access. The SPD covers the following themes and issues of particular relevance to Natural England's remit  | CCDC | Comments noted  |
| Natural England | <b>Biodiversity</b><br>We welcome the SPD's reference to the biodiversity resources on and adjoining the site. The Cannock Chase SAC strategic project and associated mitigation measures provide an opportunity as part of the Habitats Regulations Assessment process to consider and incorporate the recreation needs of new residents as part of the scheme's design.  | CCDC | Comments noted - appropriate mitigation to be discussed with Natural England. SAC mitigation is considered by each Council  |

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| Natural England | <p><b>Landscape</b></p> <p>We note the SPD's reference to the condition assessment of 'very poor' for the relevant landscape character parcel (LCP). In devising a suitable scheme design the following sources of information may be helpful:</p> <p>The site lies close to the boundary of two adjoining National character Areas (NCAs):</p> <ul style="list-style-type: none"> <li>- Cannock Chase to Cank Wood1</li> <li>- Needwood and South Derbyshire Claylands2</li> </ul> <p>Each NCA profile provides a wealth of landscape related information including high level 'Statements of Environmental Opportunity' that help to highlight broad themes of key interest.</p>              | CCDC | Comments noted  |
| Natural England | <p><b>Green infrastructure</b></p> <p>Natural England notes and welcomes the SPD's inclusion of green infrastructure (GI) networks as a key element in the design of the site. Multifunctional GI provides a framework for landscape, biodiversity, access /recreation and surface water drainage provision.</p>  | CCDC | Comments noted  |
| Natural England | <p><b>Surface water drainage</b></p> <p>We note the stated intention to retain the existing 'borrow pit' on site as a landscape and amenity/recreation resource.</p>  | CCDC | Comments noted  |
| Natural England | <p><b>Concept statement and design objectives</b></p> <p>Given the site's appreciable size (139Ha) we welcome reference to the use of a Concept Plan to guide development, together with the design objectives listed at paragraph 4.50.</p>  | CCDC | Comments noted  |
| Northway L      | <p>The redevelopment of the power station site is a golden opportunity for Rugeley and the whole Cannock chase district. As there is plenty of new housing stock being built here in Brereton and Rugeley I believe that the site should be ring fenced for business purposes only to provide jobs and security for the future of our district.</p> <p>The power station was built to provide energy to the National Grid from the Lea Hall and Littletons Collieries coal. Our district get very little attention and praise for the massive contribution that the power station and collieries of this area have made to the country as a whole over the decades of the 60s, 70s and 80s.</p> | CCDC | Comments noted however there is also a signification need to provide housing and a balance of uses. |



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|          | <p>We have one of the largest warehouses in the county currently run by the giant that is Amazon if Amazon can be attracted into our area I am sure that the power station site will be able to bring in major employers from the private and public sector. Employers which will pay good wages, help our local education sector, pay good levels of tax into our council and generally improve the life in the district as a whole.</p> <p>There are still plenty of units for smaller businesses on the developments at the Towers Business Park and its counterpart in Cannock. I believe The council should do everything in its power to ensure that high-tech businesses of all shapes and sizes who have a stable, sustainable future are given every encouragement to invest in the site. More warehouses, small business units et cetera will not replace the taxes that we stand to lose or have already lost due to the closure and run down of the Rugeley Power Station.</p> <p>Cannock chase district maybe a small part of the map politically but back in the 1950s and 60s the government put the money in and ensured the towns and districts of Cannock Chase up until the early 90s prospered. We are here again at the same starting point we were at in the 1950s it is time to grab opportunity with both hands and start to rebuild the infrastructure and industry that over many decades helped our district. The power station site along with all the developments that have already happened in our district can ensure this but more residential developments will not do that.</p> |      |   |
| Palmer D | <p>I really disagree on adding more homes to the area, Rugeley's roads are already becoming congested and our local services are at breaking point. Those who put this idea up must have not tried to get an appointment at the sandy lane GP. Rugeley is becoming over populated and the services are not being improved the accommodate this.</p> <p>My suggestion for the area would be to provide a business park that would allow stores like B&amp;Q, Matalan etc to bring business and jobs to the town, id also suggest an entertainment centre such as a cinebowl, it's been far too long since Rugeley had a local cinema.</p>   | CCDC | <p>Comments noted -infrastructure requirements will be considered further as the development progresses.</p> <p>Appropriate uses on site will be considered so not to undermine the vitality of Rugeley Town Centre in line with the Rugeley Area Action Plan</p> |

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| Payne, R, & Ricketts B | <p>1. Can it be assured that the size and number of heavy duty lorries and work vehicles be prohibited from using the roads near to and accessing Cannock Chase. i.e. Penkrige Bank Road, Bower Lane, Slitting Mill Road.</p> <p>2. That traffic in and around Rugeley Town centre is restricted to local traffic only and any increased trade/industrial traffic from the proposed development is also restricted from using the local roads.</p>   | CCDC       | Comments noted |
| Pegasus Group          | <p>These representations are framed in the context of the requirements of Regulations 11 to 16 of the Town and Country Planning (Local Planning) (England) Regulations 2012 for producing Supplementary Planning Documents (SPDs).</p> <p>In preparing the an SPD Councils are is obliged to consider national policies and guidance and comply with legal requirements.</p> <p>The National Planning Policy Framework advises at paragraph 153 that any additional development plan documents, to a Local Plan, should only be used where clearly justified and that SPDs should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development.</p> <p>The Planning Practice guidance reiterates this advice and states that SPDs should build and provide more detailed advice or guidance on the policies in the Local Plan.</p>          | LDC & CCDC | Comments noted |
| Pegasus Group          | <p><b>Lichfield District Development Plan</b></p> <p>Lichfield District Council commenced a review of its Local Plan in 2006 following the withdrawal of a Core Strategy DPD, Allocations DPD and Development Control Policies DPD which were deemed ‘unsound’ at EiP in 2004.</p> <p>The Local Plan Strategy reflected the extant permissions at Rugeley ‘A’ Power Station and proposed a Strategic Development Allocation to encompass the Rugeley ‘A’ Power Station and the former British Waterways Board (BWB) site – East of Rugeley SDA. The SDA also included further land to the east encompassing the Borrow Pit which the Council assumed had capacity to deliver a further 450 dwellings. The original intention was to fill the Borrow Pit with Pulverised Fuel Ash, however, the installation of the Flue Gas Sulpherization plant removed this opportunity.</p> <p>The East of Rugeley SDA (Core Policy 6 and Policy East of Rugeley) was allocated</p> | LDC & CCDC | Comments noted |

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|  | <p>in February 2017 following the adoption of the Lichfield District Local Plan Strategy. A Concept Statement is set out at Appendix G to the Local Plan Strategy which establishes key design principles and infrastructure requirements.</p> <p>Through cross-boundary discussions with Cannock Chase DC to discharge the Councils Duty to Cooperate, it was agreed that 500 homes within the SDA would meet needs arising within Rugeley.</p> <p>The adopted development plan for Lichfield District, relating to Rugeley Power Station, comprises:<br/>Lichfield District Local Plan Strategy (Adopted February 2017); and<br/>'Saved' policies of the Lichfield District Local Plan (Adopted June 1998).</p> <p>The Council is currently in the process of progressing a Local Plan Allocations document that is intended to replace the remaining 'saved' policies contained within the 1998 Local Plan. This document is intended to be submitted to the Secretary of State for examination towards the end of 2017.</p> <p>The Lichfield District Local Plan Strategy commits the Council to undertaking an early review or partial review of the Local Plan if cross boundary work being undertaken with the constituent LPAs within the wider Greater Birmingham Housing Market Area determines further development provision is required within Lichfield District.</p> <p>Armitage with Handsacre Parish Council is currently in the process of preparing a Neighbourhood Plan following the designation of the Parish as a Neighbourhood Neighbourhood Area on 9th July 2013. This emerging Neighbourhood Plan is at an early stage in its formulation, with a pre-submission (Regulation 14) consultation undertaken in May/June 2017. If and when this document is 'made' it will form part of the development plan relevant to the area of Rugeley Power Station within Lichfield District.</p> |  |  |
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|               | <b>Full rep then summarises the policies of the Local plan strategy and emerging Allocations document.</b>   |            |                |
| Pegasus Group | <p><b>Cannock Chase District Development Plan</b><br/>The development plan for Cannock Chase District, relating to Rugeley Power Station, comprises:</p> <ul style="list-style-type: none"> <li>• Cannock Chase Local Plan Part 1 (Adopted 2014)</li> </ul> <p>The Council is currently in the process of progressing a Local Plan Part 2 document that is intended to establish a number of allocations and development standards, and a Cannock Town Centre Area Action Plan. The Local Plan Part 2 is currently at an early stage in its preparation, with publication of a draft Plan expected towards the end of this year.</p> <p>The Cannock Chase Local Plan Part 1 considers the future of Rugeley 'B' Power Station and commits to reviewing the need for a site-specific policy to be considered within the Local Plan Part 2. In addition, the Local Plan Part 1 commits the Council to working with the other constituent authorities within the wider Greater Birmingham Housing Market Area to consider housing shortfalls and commits the Council to considering this issue through the Local Plan Part 2 if it is determined that further development provision is required within Cannock Chase District.</p> <p>Brereton and Ravenhill Parish Council is currently in the process of preparing a Neighbourhood Plan following the designation of the Parish as a Neighbourhood Neighbourhood Area on 17th January 2013. This emerging Neighbourhood Plan is at a very early stage in its formulation, with no pre-submission (Regulation 14) consultation undertaken to date. If and when this document is 'made' it will form part of the development plan relevant to the area of Rugeley Power Station within Cannock Chase District.</p> <p>Full rep then summarises the policies of Local Plan part 1 and the emerging Part 2.</p> | LDC & CCDC | Comments noted |

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| <p>Pegasus Group</p> | <p><b>Timescales</b></p> <p>Pegasus Group is generally supportive of the principle of producing an SPD to provide guidance to inform the re-development of the Rugeley 'B' Power Station site. However, as noted above, Lichfield District Council's Local Plan Allocations publication document was published in May 2017, and is scheduled for submission to the Secretary of State later this year. This document identifies additional allocations and site specific policies to support the delivery of the Local Plan Strategy, and includes a further housing allocation at the Rugeley 'B' Power Station site; allocated through Policy R1: East of Rugeley Housing Land Allocations.</p> <p>The Lichfield District Local Plan Allocations document has yet to be subject to an examination by an Inspector appointed by the Secretary of State and is thus some way off adoption. Similarly, the Cannock Chase Local Plan Part 2 is at an early stage in the preparation process; an Issues and Options consultation, having been undertaken earlier this year. It is the case that an SPD should only become supplementary to the development plan upon allocation of the site through a Local Plan document; in this case both the Lichfield District Allocations document and the Cannock Chase Local Plan Part 2.</p> <p>However, it is noted that Section 4 of the Rugeley Power Station SPD includes detailed guidance on the appropriate scale, form, density and character of development in different parts of the site, under the heading 'Development Layout' and includes 'Design Parameters' in diagrammatic form. Furthermore, earlier in the document (under Section 2 Site Analysis) there are several instances where further survey and technical work is highlighted as being necessary; these being in relation to ground conditions, ecology and flood risk. This therefore brings into question the timescales for preparing this SPD, in advance of the adoption of key policies allocating the site within a Local Plan, as well as the prematurity of establishing design parameters prior to completion of technical evidence and the selection of a developer.</p> <p>It is the view of Pegasus Group, that the progression of a Development Brief should</p> | <p>LDC &amp; CCDC</p> | <p>Page 3 of the Introduction sets out the purpose and scope of the SPD. The SPD provides the framework for development accepting that further information is emerging for the site. The SPD is intended to be flexible to respond to emerging issues whilst still delivering a development that compliments the existing local plan for both areas.</p> |
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|               | <p>be delayed to allow for all necessary technical work to be completed and to allow further dialogue with the identified developer of the site. A delay in the adoption of an SPD will have no implications for the timescales in bringing the site forward; instead, it would allow for greater certainty in respect of land uses, quantum and balance of land uses that can be achieved and scheme viability.</p>   |            |  |
| Pegasus Group | <p><b>Identification of the site as a Strategic Development Allocation (SDA)</b></p> <p>It is noted that the Rugeley Power Station Development Brief SPD does not consider this site as an extension to the existing East of Rugeley SDA as part of the plan-making process. This is particularly anomalous given that the allocation for Site R1 (East of Rugeley 1): Former Rugeley Power Station within the Lichfield District Local Plan Allocations submission document lists as a key development consideration that development proposals should have consideration to the Rugeley Power Station Concept Statement, Appendix E, of the adopted Lichfield District Local Plan Strategy, which relates to the East of Rugeley SDA.</p> <p>As noted within the SPD the site is capable of delivering a significant amount of housing and commercial development and it is the case that the identification of the site as an SDA would underline the importance of this site in delivering the spatial strategy for both Lichfield District and Cannock Chase District.</p> <p>Significant infrastructure investment would be necessary to bring forward this strategic site and identification as a SDA would recognise this, and provide parity with the other SDAs identified within Lichfield District though the provision of a lower CIL rate on land contained within Lichfield District (£14 per sqm vs. £25 per sqm). This lower CIL rate recognised the significant infrastructure investment required within the SDAs compared to non-strategic sites elsewhere within the District. The Rugeley 'B' Power Station site is of a strategic scale with significant costs expected in respect of redevelopment and should not be expected to shoulder a higher CIL Levy that the other SDAs within Lichfield District, of which the majority require no significant remediation.</p> | LDC & CCDC | SDA's were identified within the Local Plan Strategy (LDC). This is considered to be an opportunity brownfield site. |
| Pegasus Group | <p><b>Housing Provision</b></p> <p>Within the wider Housing Market Area (HMA) across southern Staffordshire there is an identified shortfall of housing land. The housing requirements established within</p>  | LDC & CCDC | Comments – the SPD identifies the site for a minimum of 800 homes. Work on the HMA shortfall is on-                  |

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|  | <p>the Lichfield District Local Plan Strategy and the Cannock Chase Local Plan Part 1 have been informed by the Southern Staffordshire Districts Housing Needs Study and Strategic Housing Market Assessment; a joint SHMA commissioned by LDC, CCDC and Tamworth Borough Council, in part to inform cross boundary housing discussions between these LPAs.</p> <p>The SHMA identified a housing requirement of between 900 and 995 dpa across Southern Staffordshire and, specifically to Lichfield and Cannock Chase Districts, the following requirement:</p> <ul style="list-style-type: none"> <li>• Lichfield District: OAN of 410-450 dwellings per annum between 2006 and 2028. The need within the Lichfield District North sub-housing market area, in which Rugeley 'B' Power Station is location, was identified as 143-157 dpa (35% of the District's need as a whole). An affordable housing need of 377 dpa was identified for the District as a whole (65% social rented/15% affordable rent/20% intermediate).</li> <li>• Cannock Chase District: OAN of 250-280 dwellings per annum between 2006 and 2028. The need within the Rugeley sub-housing market area, in which Rugeley 'B' Power Station is location, was identified as 62-70 dpa (25% of the District's need as a whole). An affordable housing need of 197 dpa was identified for the District as a whole (80% social rented/10% affordable rent/10% intermediate).</li> </ul> <p>It should be noted the SHMA, published in May 2012, utilised the 2008 Sub-National Population Projections to inform the Objectively Assessed Need (OAN) for Southern Staffordshire. These projections are now significantly out of date.</p> <p>Whilst the Household Projections only provide a very initial indication of the likely future housing needs, they provide a useful starting point in considering the direction of travel in determining appropriate housing requirements.</p> <p>Any appropriate housing requirement should however be seen in the context of the needs of the wider Housing Market Area. Both Lichfield District and Cannock Chase</p> |  | <p>going and this is being addressed via the approach towards the respective Local Plan Part 2 (CCDC), Local Plan Allocations (LDC) and Local Plan Review.</p> |
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|  | <p>District lie within the Greater Birmingham Housing Market Area (GBHMA). Work undertaken to date by the 14 constituent Local Planning Authorities that make up this HMA has demonstrated that there is a significant housing shortfall when the level of need is considered against the planned supply. The Stage 3 PBA Report considered the shortfall to be in the region of 37,900 in the period 2011 to 2031.</p> <p>The recent Black Country and South Staffordshire SHMA suggests that the shortfall could be in the region of 60,000 with an additional shortfall of 22,000 homes against supply within the Black Country.</p> <p>Cannock Chase District Council has committed to testing the delivery of 1,000 additional homes to meet the GBHMA shortfall within the emerging Local Plan Part 2.</p> <p>It is noted that Lichfield District Council is not proposing to deal with the GBHMA shortfall within the emerging Local Plan Strategy; instead committing to dealing with this issue through an early review of the Local Plan once further evidence is available.</p> <p>It is noted that the 14 constituent LPAs within the GBHMA have commissioned further work to re-consider housing need and to consider the spatial distribution options for meeting this shortfall. This work, which includes a strategic Green Belt Review, is scheduled for publication in September/October this year.</p> <p>Thus, both Lichfield District and Cannock Chase District Councils are facing increasing pressures to assist in meeting the housing shortfall identified within the wider HMA. Both authorities are considered to be constrained by virtue of Green Belt and environmental designations.</p> <p>Rugeley 'B' Power Station represents a 'windfall' not identified to date within the existing adopted strategic Local Plans. The reference to residential development being an appropriate use as part of the redevelopment of the site is therefore supported by Pegasus Group.</p> |  |  |
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|  | <p>However, in the light of the housing shortfall within the wider HMA, as noted above, the site offers an opportunity to increase housing numbers significantly above the approximate yield of 800 set out within the emerging SPD to help satisfy increasing housing pressures. For Lichfield District increasing housing numbers on the site would assist in addressing the loss of the assumed 450 dwellings, that was set to come forward on the former Borrow Pit site as allocated within the Local Plan Core Strategy. This area of the Power Station site is now proposed to be retained as a landscape/water feature and thus the 450 removed from the housing supply. For Cannock Chase District the site would provide an easy solution for delivering a significant proportion of the additional 1,000 homes currently being tested as a contribution towards meeting the wider HMA shortfall within the Local Plan Part 2.</p> <p>Agreement to deliver additional housing numbers to meet cross boundary needs is only likely to exacerbate the supply position within both authority areas.</p> <p>In respect of the Rugeley 'A' site, house building commenced in late 2010 and completed in 2017. The site has delivered 568 homes in 6.5 years through two sales outlets (Persimmon Homes and Barratt Homes). Demand for homes in this location has been strong, despite the site being overshadowed by the cooling towers associated with Rugeley 'B' Power Station. Annual completions on site have fluctuated between 42 and 175 dwellings.</p> <p>Pegasus Group consider the site is capable of supporting up to 2,000 houses as part of a comprehensive mixed use scheme across both LPA areas. An increase in housing provision supported within the site would assist in meeting the increased housing pressures in light of the significant shortfalls evidenced across the wider Greater Birmingham Housing Market Area. The recent completion of the housing element of the Rugeley 'A' Power Station site demonstrates that housing in this location is deliverable and would assist in supporting the housing land supply position for both Lichfield District and Cannock Chase District.</p> |  |  |
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| Pegasus Group | <p><b>Employment Provision</b></p> <p>The Cannock Chase Local Plan Part 1, within Policy CP8 (Employment Land), establishes an employment land requirement of at least 88ha of new and redeveloped employment land (primarily for non-town centre B class uses but with flexibility for other uses, particularly where in accordance with CP11) across the plan period from 2006 to 2028. Policy CP8 identifies sites that equate to 91ha of land.</p> <p>The emerging Cannock Chase Local Plan Part 2 is currently at an early stage in its formulation, however the Issues and Options consultation document explores the options for allocating further employment sites.</p> <p>The Lichfield District Local Plan Strategy, within Core Policy 7 (Employment &amp; Economic Development), seeks the creation of between 7,310 and 9,000 additional jobs over the plan period 2008-2029, requiring the allocation of 79.1ha of employment land and the identification of a further 10ha of employment land to provide flexibility within the employment land portfolio. The Plan recognises that considerable proportion of this requirement already has planning permission, but allocates approximately 12 hectares of additional employment land within the Cricket Lane SDA in Lichfield City.</p> <p>The emerging Local Plan Allocations document identifies the following proposed employment allocations to ensure the employment land requirements set out in the Local Plan Strategy and makes a further 6.5ha of provision to meet needs arising within Tamworth Borough:</p> <ul style="list-style-type: none"> <li>• Land South of Fradley Park (18.2ha)</li> <li>• Land east of A38 (5.1ha)</li> <li>• Land at Main Street, Alrewas (0.4ha)</li> </ul> <p>The Cannock Chase Local Plan Part 2 Issues and Options consultation document</p> | LDC & CCDC | The issue over the shortfall is being addressed by Cannock Chase Local Plan Part 2 and given the site is already an employment use, some employment use for the future is considered appropriate as a future use as part of some mixed use development. |
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highlights a shortfall in employment land provision against the requirement of 88ha established through the Local Plan Part 1. The shortfall is attributable to the loss of the Mill Green employment site from the committed supply following the issue of planning consent for a designer retail outlet village.

The employment land supply as at March 2016 is identified as follows:

|  | <b>All Sites (ha)</b> | <b>New Sites (ha)</b> | <b>Redevelopment (ha)</b> |
|--|-----------------------|-----------------------|---------------------------|
| <b>Completions 2006-2016</b>                 | 45.92                 | 36.76                 | 9.16                      |
| <b>Available Supply (under construction)</b> | 46.81 (2.05)          | 35.24                 | 11.57                     |
| <b>Total Supply 2006 -2028</b>               | 92.73                 | 35.24                 | 11.57                     |
| <b>Less Local Plan Part 1 Target</b>         | 88                    | -                     | -                         |
| <b>Balance</b>                               | +4.73                 | -                     | -                         |
| <b>Balance minus Mill Green</b>              | -2.87                 | -                     | -                         |

Whilst a deficit in supply is identified, the Issues and Options document highlights that the above figures do not make any allowance for provision within the Rugeley 'B' Power Station site, on the basis that proposals are still emerging.

The latest employment land position in respect of Lichfield District is set out in the Employment Land Availability Assessment (ELAA) 2016. This document identifies

the following supply position within the District:

|   | <b>Uses</b>     | <b>Ha</b>    | <b>Floorspace</b> |
|---|-----------------|--------------|-------------------|
| <b>Completions 2008-2016</b>              | B1/B2/B8        | 29.89        | 74,312            |
| <b>Sites currently under construction</b> | B1/B2/B8        | 2.54         | 6,669             |
| <b>Sites with planning permission</b>     | B1/B2/B8        | 65.34        | 208,044           |
| <b>Available sites</b>                    | B1/B2/B8        | 45.72        | 158,573           |
| <b>Total 'Available' Supply</b>           | <b>B1/B2/B8</b> | <b>113.6</b> | <b>373,286</b>    |

The position demonstrates a supply of general employment land exists that significantly exceeds the employment land requirement of 79.1ha (+ additional 10ha for flexibility) set out in the Local Plan Strategy. Identification of a further 23.7ha within the emerging Local Plan Allocations further strengthens this position even having regard to the 6.5ha identified for meeting needs arising within Tamworth Borough.

Within Cannock Chase District, the emerging Local Plan Part 2 and the current evidence base does not support the need to identify significant levels of additional employment land within the Rugeley 'B' Power Station site. The shortfall, as evidenced by the

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|  | <p>Council, stands at 3ha. This compares to approximately 30ha identified within the emerging Rugeley Power Station Development Brief SPD.</p> <p>Whilst the 88ha requirement is set out as a minimum requirement within the Local Plan Part 1, a significant oversupply could be argued to result in an imbalance between jobs creation and housing delivery.</p> <p>Within Lichfield District, the existing employment land portfolio is strong with a significant committed supply. The emerging Local Plan Allocations seeks to strengthen this provision through the identification of additional allocations to provide flexibility. Therefore, justification for requiring the delivery of employment land within the Rugeley 'B' Power Station site within Lichfield District does not exist.</p> <p>The published evidence base and latest employment land supply information published justify a limited need for further employment land to be secured within the Rugeley Power Station site than that inferred within the Development Brief. This is coupled with market concerns that the delivery of significant employment in this location would be difficult to achieve in the current plan period. It is noted that there is vacant land within the adjacent Towers Business Park and that the take up rate to date within the business park has been slow to date.</p> <p>Whilst Pegasus Group welcomes the identification of employment land as an appropriate use as part of a comprehensive mixed use scheme across both LPA areas, it considers the Design Parameters Plan places far too much emphasis on the level of employment land that should be incorporated within the scheme. The level of employment provision indicated appears at odds with the Council's published evidence base.</p> <p>As the portfolio of employment land within Lichfield District is strong and only a marginal shortfall in supply is identified in Cannock, the Development Brief should support a reduction in the indicative starting point for employment provision set out in the Design Parameters plan accordingly.</p> |  |  |
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| Pegasus Group | <p><b>HS2</b></p> <p>Subsequent to the preparation of the Rugeley Power Station Development Brief, HS2 has identified a number of safeguarded land areas related to the second phase of the high-speed rail project. This identifies an area of proposed safeguarded land within the Rugeley 'B' Power Station site, including the current main access to the Power Station. This relates to the upgrade of voltage to the West Coast Mainline to allow HS2 trains to utilise the WCML if necessary. A plan of the proposed safeguarded land is attached at Appendix 1.</p> <p>At present, it is not understood what implications this proposed safeguarding will pose for the phasing and delivery of development within the Power Station site. It is recommended that further dialogue is undertaken with HS2 to explore the extent of the safeguarded land required to support the delivery of HS2 and to understand the timescales and operational restrictions that may be imposed on any developer or occupier of the site in the short, medium and long term. This further dialogue will need to inform the Development Brief and any guidance provided in respect of phasing and delivery. In addition, the constraints plan within the Development Brief should be updated to include the identification of the safeguarded land.</p> | LDC & CCDC | Comments noted – HS2 will need to be addressed within the SPD.                        |
| Pegasus Group | <p><b>Viability</b></p> <p>The Development Brief acknowledges at paragraph 2.67 that the majority of the land will require remediation and work is ongoing to understand the extent of the remediation works required. The Development Brief also recognises that demolition is anticipated to commence in 2018 and take two years to complete. Until demolition is underway, the level of remediation necessary, particularly in those areas currently comprising heavy infrastructure, is unlikely to be fully quantifiable.</p> <p>It should be recognised that site will require significant investment at the outset to allow development to come forward. The cost of the remediation works is unknown at present and therefore it is necessary to ensure maximum flexibility for determining an appropriate balance of uses within the Development Brief. Such flexibility should include the balance between employment and residential development, quantum of development and phasing and funding of necessary infrastructure.</p>  | LDC & CCDC | Comments noted and will be the subject of further discussion as the scheme progresses |

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|               | <p>As set out above, Pegasus Group consider the site is capable of accommodating up to 2,000 dwellings as part of a comprehensive mixed-use scheme. An increase in the level of residential floorspace within the site would increase the viability of any final scheme and would not undermine the ability to deliver new jobs and employment uses within the site.</p>   |            |   |
| Pegasus Group | <p><b>CONCLUSIONS</b></p> <p>Whilst Pegasus Group welcomes the preparation of a Development Brief to assist in bring forward redevelopment of the former Rugeley 'B' Power Station site, it is considered necessary to delay the progression of a such guidance to allow for all necessary technical work to be completed and to provide opportunity for further dialogue with selected purchaser of the site in due course.</p> <p>At this point in time a Development Brief cannot achieve the intended purpose of providing 'guidance to the landowners, developers and the local community about expectations with regards to layout, form and quality of development on the site.'</p> <p>This is due to the following uncertainties:</p> <ul style="list-style-type: none"> <li>• Further work is ongoing in respect of ground conditions to understand the extent of remediation works required;</li> <li>• Secondary access is currently subject to a live planning application and pending consideration; and</li> <li>• Implications related to the proposed safeguarding of land in respect of HS2.</li> </ul> <p>A delay in the adoption of an SPD to allow for the completion of further technical work will have no implications for the timescales in bringing the site forward; instead, it would allow for greater certainty to be provided to landowners, developers and the local community in respect of land uses (including infrastructure provision) and the quantum and balance of such land uses that can be achieved to ensure scheme viability.</p> | LDC & CCDC | The SPD provides a framework for future development. The SPD is flexible to respond to further evidence coming forward. |

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|  | <p>In light of outstanding technical work referred to above and evidence published to date relating to housing and employment provision, there is a need to provide far greater flexibility within the Development Brief between the balance of housing and employment land supported as part of a comprehensive mixed use development.</p> <p>The published evidence base supporting the plan making process highlights the significant housing shortfall within the Greater Birmingham Housing Market Area and the increased pressures being placed upon both Cannock Chase and Lichfield District in identifying additional housing sites. In addition, as the portfolio of employment land within Lichfield District is strong and only a marginal shortfall in supply is identified in Cannock, the need to identify additional employment land in this location is low.</p> <p>Therefore, the Development Brief should reflect a reduction in the indicative starting point for employment provision sought and provide no limit on the levels of residential provision at this stage.</p> <p>Pegasus Group consider the site is capable of accommodating up to 2,000 dwellings as part of a comprehensive scheme. An increase in the level of residential floorspace within the site would increase the viability of any final scheme and would not undermine the ability to deliver new jobs and employment uses within the site.</p> <p>If the Development Brief is to proceed to adoption, it will be necessary to remove Figure 4.4 from the document to ensure the necessary flexibility is provided.</p> |                       |                       |
| <p><i>Rugeley Town Council</i></p>     | <p><i>Comments to be submitted 7/09/2017</i></p>  | <p>CCDC</p>           |                       |
| <p>Savills<br/>(Rugeley Power Ltd)</p> | <p>We are instructed by Rugeley Power Limited (RPL), owners of Rugeley Power Station, to submit representations in respect of the current consultation on the Rugeley Power Station Development Brief draft supplementary planning document. These comments are put forward in furtherance of the ongoing constructive dialogue between both Cannock Chase District Council and Lichfield District Council with RPL. The comments seek amendment to the Development Brief to ensure that it is consistent with the adopted development plan and therefore capable of adoption as a SPD for which it</p>   | <p>LDC &amp; CCDC</p> | <p>Comments noted</p> |



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|                                   | needs to be in conformity with and supplementary to development plan policy. Our comments also set out the possible implications of the High Speed Rail Phase 2a (West Midlands to Crewe) hybrid Bill which was laid before Parliament on 17 July 2017. Further comments provide clarification and thoughts on practical matters to ensure the Development Brief promotes a deliverable and viable form of development. Comments are set out with reference to the paragraph numbers of the draft Development Brief.  |            |  |
| Savills<br>(Rugeley<br>Power Ltd) | <p><b>1.5 and 4.4</b></p> <p>The Brief states that development proposals “should comprise a range of housing including self-build housing”. This is not in conformity with or supplementary to either Council’s development plan, nor is it realistic or appropriate to the circumstances of the site.</p> <p>There is no policy requirement in the housing policies of either the CCDC or LDC development plans for housing development either on allocated or windfall sites to include an element of self-build housing.</p> <p>Self-build housing will by definition be brought forward as individual plots by persons that are not developers. Such a form of development is better suited to windfall sites and small allocations of a few plots where there is existing infrastructure where private buyers will be able to deliver a house into an existing built context.</p> <p>The property market is naturally geared towards the sale of individual plots or small sites in such situations to private buyers. Mainstream housebuilders and developers are not attracted to buy such sites. By contrast, the Power Station site is being planned comprehensively as the draft Development Brief attests. The site is complex and requires a comprehensive approach to ground remediation and infrastructure provision and is proposed for a minimum of 800 houses plus mixed uses. In these circumstances it is not practicable to dispose of individual plots to private individuals.</p> <p>The Brief should therefore be amended to delete a requirement for the development to include self-build housing.</p> | LDC & CCDC | The SPD encourages self-build however it is not a requirement              |
| Savills<br>(Rugeley<br>Power Ltd) | <p><b>1.13</b></p> <p>By way of clarification, it would be helpful to note that RPL has been a member of the Task Force and has engaged cooperatively with it throughout.</p>   | LDC & CCDC | Comments noted – Paragraph 1.13 will be amended                            |
| Savills<br>(Rugeley<br>Power Ltd) | <p><b>2.13 point 3 and 2.42</b></p> <p>Insert the word “former” in front of Sports and Social Club to be accurate and consistent with the remainder of the Brief.</p>   | LDC & CCDC | Comments noted - Guidance of Sport England will be followed on this matter |

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| Savills<br>(Rugeley<br>Power Ltd) | <p><b>2.22</b><br/>The draft Brief states that “it is understood that Historic England decided against listing the cooling towers following a recent assessment”. The assessment by Historic England is a matter of public record which the Brief can report affirmatively. Historic England assessed the whole of the Rugeley B Power Station site not just the cooling towers, and in January 2017 concluded that none of the buildings on the Power Station meets the criteria for listing. The recommendation that Historic England made was therefore to reject the listing of any of the site.<br/>The Brief should be amended to accurately report the Historic England assessment.</p>   | LDC & CCDC | Comments noted – Paragraph 2.22 will be clarified  |
| Savills<br>(Rugeley<br>Power Ltd) | <p><b>2.23</b><br/>If the Council considers that the significance of any of the heritage assets identified will be affected by redevelopment of the power station it would be helpful to identify which assets and how, in order that those matters can be specifically considered in any subsequent proposals. If however, it is not possible to determine at this stage whether the significance of any assets will be affected by development, it would be helpful to state that and outline what information the Council will require to consider this in due course.</p>  | LDC & CCDC | Comments noted – Reference to Conservation and Heritage will be strengthened in the SPD          |
| Savills<br>(Rugeley<br>Power Ltd) | <p><b>2.28 and 4.20</b><br/>Reference is made to the current application for a “secondary” access point from the A513 to facilitate demolition works. Amendment is needed to clarify the current application, what it is for and why, and how that has now acquired increased importance as a result of the High Speed Rail (HS2) Phase 2a Bill.<br/>The current application is not for a secondary access, but is for an additional access point to serve the existing requirements of the power station. There are a number of specific reasons for needing that access which are set out in the application submission. These are not secondary matters but matters of the utmost importance to the operation and preparation of the site for redevelopment, and the continued operation of the National Grid 400kv substation, the Western Power Distribution 132kv sub station and the Network Rail substation serving the west coast mainline.<br/>The draft Brief states at 4.20 that the existing access from the A51 should be the primary access serving the redeveloped site, with any other access being secondary. If the HS2 Phase 2a Bill receives Royal Assent this aspiration of the draft Brief will not be achievable. The HS2 Bill proposals include the legal instruments to acquire by</p> | LDC & CCDC | Comments noted - Engagement with Staffordshire County Council will be on-going regarding access. |

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|                                   | <p>compulsory means various parcels of land within the Rugeley Power Station site. This will split the site into two separate parts with a strip owned by HS2 between them. It will not be possible for a developer or either Council to lay a road connecting the two parts of the Power Station site. Neither will a developer progress redevelopment proposals assuming a combined site whilst the HS2 Bill remains live, as this is an unacceptable threat to such a form of development. Accordingly each of the two halves of the Power Station site will require its own access. It may be beneficial for there to be more than one point of access to each part of the site, and the status of primary or secondary access may become even less relevant.</p> <p>Assessment of access requirements undertaken ahead of the current access planning application identified the need for at least one additional access for the development potential of the Power Station site to be realised. It can be expected therefore that future development as envisaged by the Brief will require one or more additional accesses to be developed. It is acknowledged that a further planning approval will be required for an access to serve the redevelopment and that is not the purpose of the current access application. However, the Brief should acknowledge that a new primary access will be required to serve the eastern part of the site.</p> <p>The current proposed additional access is expected to be granted planning permission imminently. All matters raised during consultation have now been resolved to the satisfaction of all officers and statutory consultees concerned. The Brief should be brought up to date when that permission is granted.</p> |            |   |
| Savills<br>(Rugeley<br>Power Ltd) | <p><b>2.41 and 4.34</b></p> <p>The Brief seeks to retain, where possible, the key landscape features highlighted in the figure (note error in reference). The landscape features identified in Figure 2.6 includes tree planting within pulverised fuel ash (pfa) bunds, and an amenity lake and recreation areas laid out on elevated pfa deposits.</p> <p>The ground reclamation strategy is still being considered, taking account of engineering factors and requirements flowing from the environmental permits related to the former power station use which extend across the site. It is possible that it may be necessary to remove the pfa which will necessitate the removal of the ground features and the vegetation growing from it. Given the potential for this outcome, it would be helpful for the Brief to acknowledge this.</p>   | LDC & CCDC | The retention of the Borrow Pit should be seen in context of redeveloping the site. |

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|                                | <p>In the same terms, the Brief also identifies a preference for the Borrow Pit to be retained if possible. This is at odds with the LDC Local Plan Strategy (2015) which allocates the entirety of the Borrow Pit for development as part of the East of Rugeley Strategic Allocation. The Brief cannot re-write or usurp the development plan to which it is supplementary. The Brief should therefore support the development of the Borrow Pit in accordance with the Local Plan Strategy. It may however, also be possible for the Brief to confirm support for an alternative form of development whereby the housing allocated for the Borrow Pit is located elsewhere on the site.</p> <p>It is acknowledged that Brief paragraph 2.41 does state “where possible retaining” but given the significance of the areas of strategic landscape identified on figure 2.6 which may potentially have to be cleared, and the need for the Brief to be consistent with the Local Plan, the retention of these landscape features should be expressed as more of an aspiration and less of a requirement.</p> |            |   |
| Savills<br>(Rugeley Power Ltd) | <p><b>2.45</b><br/>By way of clarification: The main Power Station sports and social club lease and use of the sports facilities on site finished at the end of March 2017.</p>   | LDC & CCDC | Comments noted  |
| Savills<br>(Rugeley Power Ltd) | <p><b>2.49</b><br/>The comments made in respect of the Borrow Pit under 2.41 apply. The support for retention of the Borrow Pit should also acknowledge support for the redevelopment of the Borrow Pit in accordance with the Local Plan allocation.</p>   | LDC & CCDC | The retention of the Borrow Pit should be seen in context of redeveloping the site. |
| Savills<br>(Rugeley Power Ltd) | <p><b>2.50</b><br/>It should be noted that RPL have been able to agree to continued use the allotments whilst redevelopment of the site is considered. The Brief should simply state support for the retention of the allotments.</p>   | LDC & CCDC | No change proposed – it is considered that the Brief is clear                       |
| Savills<br>(Rugeley Power Ltd) | <p><b>2.73</b><br/>It appears the words “be brought” are missing.</p>   | LDC & CCDC | Comments noted – Paragraph 2.73 will be amended                                     |
| Savills<br>(Rugeley Power Ltd) | <p><b>2.74</b><br/>The Brief refers to the County Minerals Local Plan and the minerals safeguarding area which covers much of both local authority areas including the Power Station site. Appendix 6 of that plan gives exemption from the safeguarding policy for sites within the urban area and for allocated sites where the assessment of site options took account of minerals safeguarding.</p>   | LDC & CCDC | Comments noted - the advice of SSC Minerals will be sort on this matter             |

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|                                | <p>With the exception of the golf course, none of the Power Station site is located within the countryside, the area of the Power Station expected to be redeveloped is wholly within the urban area. Additionally, the Borrow Pit is allocated for development. It follows therefore that the minerals safeguarding policy should not apply to the majority of the site. The Brief should be amended to provide a clear statement of the District Councils' interpretation of the minerals policy in this regard.</p>   |            |  |
| Savills<br>(Rugeley Power Ltd) | <p><b>2.83 and 3.7</b><br/>Other than by reference to Figure 2.11 (para 2.83) and Figure 3.1 (para 3.7) there is no mention that the Borrow Pit forms a significant part of the East of Rugeley Strategic Development Area, nor is there reference to the residual quantum of development which the allocation relies upon from the Borrow Pit. It would aid completeness for the Brief to be clear in this regard.</p>  | LDC & CCDC | No change proposed – it is considered that the Brief is clear  |
| Savills<br>(Rugeley Power Ltd) | <p><b>2.89 and Figure 2.14</b><br/>It is acknowledged that this is a section on opportunities and not prescriptive policy, however it has the potential to confuse and be at odds with the LDC Local Plan Strategy. The key and the text state the Borrow Pit to be retained as a landscape / water / recreation feature. As noted with reference to 2.41 and 2.49, the Brief cannot ignore the fact that the Borrow Pit is allocated for development.<br/>The potential secondary access points indicated on the figure are unlikely to be deliverable without compulsory acquisition of third party land interests as the Councils are well aware. The most likely location for an additional access (which will be the primary access to the eastern part of the site as a result of the HS2 proposals) is from the A513 around the location of the current application for an additional access to the site. The location of the current application is consistent with Map G.2 East Rugeley Concept Diagram in the Local Plan Strategy. The Brief should therefore not promote access locations which cannot be delivered unless the Councils are prepared to use compulsory purchase powers. The location of a deliverable additional access and should be identified consistent with that shown in the Local Plan Strategy.</p> | LDC & CCDC | <p>The retention of the Borrow Pit should be seen in context of redeveloping the site.</p> <p>Further discussions on the access will take place as more information becomes available on the site.</p> |
| Savills<br>(Rugeley Power Ltd) | <p><b>3.9 and 3.10</b><br/>The Brief refers to the Concept Statement (Appendix E) of the draft Local Plan Allocations document.</p>  | LDC & CCDC | Comments noted – these matters are taken account of in the SPD and subject to discussions as   |

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|  | <p>Aspects of the Concept Brief are repeated in the Brief. RPL submitted representations to the LDC Local Plan Allocations document including specifically in respect of the Appendix E Concept Statement. Those representations are copied below for ease of reference. These same comments are relevant and should be taken into account within the Brief.</p> <p>The matters set out at Appendix E are a 'Key Development Consideration' as referenced in Policy R1, with which development should comply. Appendix E contains a number of requirements which are unreasonable and in appropriate.</p> <p>E2 states that the development should ensure that it makes best use of the land. This is supported.</p> <p>E3(1) states a minimum of 800 homes. This is supported.</p> <p>E3(2) The objective for enhancement of ecological interests in addition to protection of ecological interests goes beyond NPPF requirements for planning policy in Local Plans as set out at 109 – 117 of the NPPF. Where the NPPF does seek enhancement of biodiversity it is with regard to the specific circumstances set out in 118. The LPA policy should not seek to place an undue burden on development which makes the use of previously developed land inefficient.</p> <p>E4(2) requires a net gain to biodiversity which as noted above goes beyond what is required by the NPPF and could run counter to the efficient use of previously developed land. The paragraph also states that existing mature trees and hedgerows will be retained. Council officers are aware that large areas of the R1 allocation site are overlain with pulverised fuel ash (PFA) which is a recognised grade of by product from the power station combustion process. The entirety of the R1 allocation site is within the area of Environmental Permits relating to the operation of Rugeley B Power Station. The operation of those permits may require the removal of the PFA from the site, or the relocation and stabilisation of the PFA within the site. In either event, the vegetation and mature trees currently rooted in the PFA will necessarily be removed. Such action is independent of the planning process for the redevelopment of the site, and cannot therefore be controlled through development plan policy.</p> <p>E4(3) The paragraph relates to natural assets, but seeks to retain the existing sports facilities within the Power Station site. Those sports facilities are not natural assets and are constructed on a raised area of PFA on what was historically a PFA settlement lagoon. For the same reasons as set out above in relation to the retention of trees and</p> |  | <p>further information becomes available.</p> |
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|  | <p>hedgerows, it may be an environmental requirement that the PFA and hence the sports facilities are removed. Rugeley Power Ltd is working with its technical team to determine what works are required to comply with the Environmental Permits.</p> <p>E4(3) The preference expressed for the retention of the Borrow Pit as a water feature is contrary to adopted LPS policy CP6. As set out in objections to Table 4.1 and policy R1, the LPA cannot change adopted LPS policy, to do so requires a formal review of the LPS.</p> <p>E4(6) The R1 allocation site can be connected with the Borrow Pit component of the East of Rugeley SDA which is within the control of the same landowner. LDC Officers are aware that the ability to connect the R1 site to other elements of the East of Rugeley SDA is constrained by third party land holdings over which Rugeley Power Limited has no control. If those third parties are unwilling to cooperate, achievement of linkages between the R1 site and those parts of the East of Rugeley SDA is a matter that only public authorities can achieve through the use of their compulsory purchase powers.</p> <p>E4(7) LDC officers are aware that third party landholdings also constrain where access can be taken into the R1 site. Whilst it may be desirable to take access from neighbouring development, the LPA must recognise that achievement of this is unrealistic and not within the control of Rugeley Power Limited or the development of the R1 site.</p> <p>E4(14) Public art may be appropriate as part of the development, but it should not be a specific requirement. LPS policy CP12 supports public art, but does not require it.</p> <p>E4(15) The existing allotments at Rugeley B Power Station are not within the R1 allocation site as currently defined on the Proposals Map. As such policy R1 should not seek to control what happens to that land. The allotments are within the area of the adopted East Of Rugeley SDA.</p> <p>E5 Summary:<br/> The summary introduces new requirements which have not been considered elsewhere. This includes a requirement for a community hub to incorporate a community sports building and small scale convenience retail provision, and provision of a new primary school. No justification is provided for any of these requirements. In all cases, the provision of sports and community facilities and school places should only be what is necessary in accordance with policy in the adopted LPS to make the development acceptable. It is desirable that there is flexibility for convenience retail</p> |  |  |
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|                                   | <p>provision to come forward as part of the development, but this should not be a fixed requirement in the absence of demonstrated retail need.</p> <p>The retention (or replacement) of existing sports pitches and facilities should be regarded as contributing towards the provision necessary to support the new housing development, not in addition to it. This stands to reason as if full provision of sports facilities is made additionally, it would render the existing facilities surplus. The requirement to make new provision and retain the existing should therefore be changed to make appropriate provision from either new or existing facilities or a combination of the two.</p> <p>As noted above the retention of trees and hedgerows may be unachievable given the likely need to remove PFA, from which many trees and hedgerows are growing. The requirement for all development to be within 350m of a bus stop is overly onerous. The Government and urban design best practice guidance sets a more realistic requirement for 400m.</p> |            |   |
| Savills<br>(Rugeley<br>Power Ltd) | <p><b>3.22</b></p> <p>When referring to developer contributions it is unclear whether the Brief is referring to CIL or S106 or both. CIL is adopted and payable as stated. Contributions through S106 may only be sought where they are necessary in planning terms, directly related to the development and fair and reasonable. The Brief should be clear in this regard.</p>   | LDC & CCDC | Comment noted – S106 contributions will only be sought where appropriate.   |
| Savills<br>(Rugeley<br>Power Ltd) | <p><b>3.26</b></p> <p>The desire expressed by the draft Brief for the Borrow Pit to be retained as a landscape / recreation facility, would require the Local Plan allocation for approximately 450 dwellings on the Borrow Pit (as part of the East of Rugeley SDA) to be re-provided elsewhere on the Power Station site. The Local Plan Allocations document identifies the site as an extension to the East of Rugeley SDA, and so the relocation of that housing provision could be considered to remain with the SDA. The CIL rate chargeable to those approximately 450 dwellings relocated from the Borrow Pit within the Power Station site should therefore, be eligible for the CIL rate applicable to the SDA. It would be helpful for the Brief to confirm this if possible.</p> <p>As an extension of the SDA, it would also be helpful to consider whether the reduced CIL rate which was deemed appropriate for the SDA could also be applied to the whole Power Station site as an extended SDA.</p>   | LDC & CCDC | <p>SDA's were identified within the Local Plan Strategy. This is considered to be an opportunity brownfield site.</p> <p>CIL rates are set by the respective Councils and are already adopted</p> |



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| Savills<br>(Rugeley<br>Power Ltd) | <p><b>3.33, 4.14 and 4.48</b></p> <p>The requirement for a community hub and its composition, should be considered alongside the overall quantum and mix of uses across the site. Once the role and function of the hub is known, the most appropriate location for it within the site can be determined, taking account of all relevant factors, including the need for commercial viability. The HS2 Bill proposals which sever the site in two will also influence the most appropriate location. The preference for a location at the centre of the site should not therefore be predetermined by the Brief.</p>  | LDC & CCDC | Comments noted  |
| Savills<br>(Rugeley<br>Power Ltd) | <p><b>4.51 and Figure 4.4</b></p> <p>For the reasons set out above it is not considered that the Design Parameters illustrated at Figure 4.4 “should be the starting point for any proposals”.</p> <p>Retention of the Borrow Pit as a landscape / recreation feature may be desirable in the context of the wider site, but is not strictly in conformity with the Local Plan.</p> <p>The location of the additional accesses are unrealistic and inconsistent with the Local Plan Strategy.</p> <p>The location of the community hub may not be appropriate for its purpose or commercial viability depending upon the development mix.</p> <p>The area of recreation and open space may have to be cleared, and there are many locations within the site that are suitable for the provision of the necessary sports pitches.</p> <p>The existing high bund along the southern boundary of the Power Station site along the north of the Persimmon development, may have to be removed for engineering reasons depending upon the requirements for remediation to the ash lagoons. The vegetation in this area may therefore have to be cleared in order to prepare the ground for redevelopment. If as proposed by the Brief the ash lagoon area is re-developed for residential, then there should be no need for a buffer between uses.</p> <p>Whilst Figure 4.4 may illustrate the Council’s preferred layout based upon its current understanding, the Brief should not close off the opportunity for alternative layouts as and when further information is known.</p> | LDC & CCDC | The SPD provides the framework for development accepting that further information is emerging for the site. The SPD is intended to be flexible to respond to emerging issues whilst still delivering a development that compliments the existing local plan for both areas. |
| Savills<br>(Rugeley<br>Power Ltd) | <p><b>5.2</b></p> <p>It is stated that an Environmental Statement will be required due to the scale of</p>  | LDC & CCDC | Comments noted – Paragraph 5.2 to be amended to refer to EIA screening request  |

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|               | development. Can the Brief provide more detail on what significant environmental effects are considered to be likely?  |            |   |
| Slater, Z     | Rugeley is growing at an alarming rate with houses been built on any available land but we are greatly lacking in shopping and leisure facilities especially for young people. I would love to see facilities being added to on the site as I now live on the hawkseyard estate and there is nothing but a small park for children and no facilities for teenagers.  | CCDC       | Comments noted- infrastructure requirements will be considered further as development progresses  |
| Sport England | The overall drivers for the project are shaped around the national policy context in Section 3. I wonder if there are any local drivers that could be drawn out which make this location different. Are there any local challenges that this project could help deliver/address if clearly incorporated in the SPD?  | CCDC       | The local drivers are those set out in the adopted policy as part of the Local Plan Strategy and Local Plan Part 2.                             |
| Sport England | Given the national emphasis on planning and health and initiatives such as ‘Healthy Towns’ I wonder, with Rugeley being a relatively deprived community, whether this might merit an bit more emphasis (appreciating it is listed as one of the criteria in section 3)? There are a number of bodies engaged in promoting healthy active communities, including the NHS, Public Health England and ourselves, and we’ve updated and refreshed our guidance on ‘Active Design’ (along with Public Health England) which is referenced in both Local Plans (Cannock LP: Par 4.9, Policy CP3 – Chase Shaping – Design, and Lichfield LP: CP 10 – Healthy & Safe Lifestyles) but not highlighted in the body of the SPD. The youtube video below gives a short visual summary of the guidance and the link below that provides access to the background information and a copy of the guidance itself.<br><a href="https://www.youtube.com/watch?v=mDaVBh1Bs7Y">https://www.youtube.com/watch?v=mDaVBh1Bs7Y</a><br><a href="https://www.sportengland.org/facilities-planning/active-design/">https://www.sportengland.org/facilities-planning/active-design/</a><br>We would like to see the SPD encourage any developer to embed the philosophy of healthy and active communities and for a developer to be required to utilise our ‘Active Design’ guidance as part of the quality design process, and if you are in agreement to perhaps use the development as a new case study for Active Design? | LDC & CCDC | Comments noted – the SPD will be amended to make reference to ‘Active Design’ guidance and this will be encouraged as development is progressed |
| Sport England | In terms of sports provision in general there are two separate elements which I don’t think the SPD really draws out clearly enough. These are: <ul style="list-style-type: none"> <li>• The protection of the EXISTING sports club facilities, which meet <u>current</u> demand</li> <li>• The provision of new sports facilities, to meet <u>new</u> demand arising from planned housing growth</li> </ul>   | LDC & CCDC | Discussions are ongoing with Sport England and other relevant parties in relation to this issue   |

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|               | <p>Whilst the solution may be provided via one community hub the way a masterplan addresses sport and recreation really needs to ensure it addresses both:</p> <ul style="list-style-type: none"> <li>• Protection - NPPF Par 74 and Sport England policy to protect playing fields in the context of the existing sports facilities<br/>(<a href="https://www.sportengland.org/facilities-planning/planning-for-sport/planning-applications/playing-field-land/">https://www.sportengland.org/facilities-planning/planning-for-sport/planning-applications/playing-field-land/</a>)</li> <li>• Provision - NPPF Par 73, any robust and up to date evidence base for sport and NPPF Pars 17, 58, 70 and 171<br/><a href="https://www.sportengland.org/facilities-planning/planning-for-sport/planning-applications/major-developments/">https://www.sportengland.org/facilities-planning/planning-for-sport/planning-applications/major-developments/</a></li> </ul>  |            |   |
| Sport England | <p>Par 1.5 – in several instances reference is made to ‘open space and recreational facilities’. Can I recommend, to be consistent with NPPF Par 74, that this reads ‘open space, <b>sport</b> and recreation’. This will avoid lack of clarity between informal physical activity (such as play, walking etc. that is generally regarded as informal recreation) and sport which is generally regarded as formal activity. Also applies to Par’s 2.13 bullet 3, 3.22, 4.14, 4.28, 4.29, 4.44 ....</p>  | LDC & CCDC | Comments noted – references will be amended   |
| Sport England | <p>Par 2.7 – it might be helpful to show the green belt on one of the maps?</p>   | LDC & CCDC | Comments noted – a contextual background plan will be provided                                  |
| Sport England | <p>Par 2.9 – the site may be well located but is there sufficient capacity in existing services and facilities to meet the additional demand? The snapshots below [<b>see full rep</b>] for example provide 2017 data for the usage of Rugeley Leisure Centre (the only community LC in Rugeley) which illustrates that the swimming pool (top table, yellow highlights) is 86% full at peak time (Sport England recommend 70% utilised capacity at peak times otherwise there is insufficient space to swim) and the sports hall 100% full (second table) at peak times (Sport England recommends 80%). This indicates for example in terms of built sports facilities that there is unlikely to be sufficient capacity at Rugeley Leisure centre to absorb new demand from housing growth, even if it is well located.</p> <p>If housing growth is the figure given in Par 1.7 (10,050 dwellings) this is equivalent to an additional 24,072 local residents. Using our Sports Facility Calculator this scale of housing growth would generate demand for a 7 court sports hall, a 5 lane 25m</p> | LDC & CCDC | Discussions are ongoing with Sport England and other relevant parties in relation to this issue |

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|               | <p>swimming pool and 1 AGP (this can be re-run depending on final housing numbers associated with this specific proposal but it give a feel for the scale of additional built sports facilities required to meet new demand). <a href="https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/sports-facility-calculator/">https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/sports-facility-calculator/</a></p> <p>My point is that existing formal built sports provision in Rugeley appears to already be over used at peak times and additional growth will increase that demand. Measures need to be put in place to meet that new demand and planning contributions/CIL/land etc. secured to ensure delivery. It might be helpful to ref. use of Sport England’s Sports Facility Calculator (which can be used by Councils or developers via the Active Places Database) in the SPD to work out what level of new provision is required, which meets the CIL tests, and how it is to be delivered.</p> |            |  |
| Sport England | <p>Par 2.12 – describing the club as ‘former’ is a bit misleading as it has only had to close due to the decommissioning and demolition of the power station. I suggest this is clarified.</p>  | LDC & CCDC | <p>Comments noted – text will be amended to read ‘former sports and social club building’</p>  |
| Sport England | <p>Par 2.43 – the list of sports facilities is not comprehensive. The ‘cricket oval’ should really be referred to as a ‘cricket pitch’, the ‘lawn bowls’ should be referred to as ‘a crown bowling green’ and there is also an 18 hole golf course and an angling/course fishing lake/pond (although this is mentioned in 2.46 it ought to be recognised as a sport taking place on the site).</p>  | LDC & CCDC | <p>Comments noted – Paragraph 2.43 will be amended</p>   |
| Sport England | <p>Par 2.45 – my understanding from the task force agreement is that there would be a transitional plan put in place to relocate the users during decommissioning/demolition with the potential to re-open the sports club once the site was safe to access. This par. assume closure is permanent and rather undermines the policy position reinforced via NPPF 74 and SE policy to protect playing fields.</p>  | LDC & CCDC | <p>It is the expectation set out in the SPD that sufficient provision of sport and recreational facilities will be made available on this site to the satisfaction of Sport England.</p> |
| Sport England | <p>Site Analysis Map – general point that the plans are difficult to read, especially the key with is too small and blurry.</p>   | LDC & CCDC | <p>Comments noted</p>  |

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| Sport England | Par 2.89 includes the opportunity to accommodate a local centre to include a sports building. I think this, and other references, don't really make it clear that outdoor space would need to be provided as part of this 'hub' which meets the protection/provision requirements for sport set out in point 3 above (e.g. pitches, changing rooms, perhaps an AGP/MUGA etc.). I would also suggest that bullet 6, and ref to pedestrian and cycling links should not only connect to local services/facilities but also act as part of a wider recreational walking/cycling/running routes to help improve opportunities for active lifestyles – maximising the value of the canal and other green infrastructure for example? | LDC & CCDC | Comments noted – Bullet point six will be amended   |
| Sport England | Section 3, National Planning Policy Context. I expect you don't want to go into too much detail here but given there is existing sports facilities on site which are protected under NPPF 74 and policy to protect playing fields - would it help to ref. that in this section?   | LDC & CCDC | No change proposed  |
| Sport England | Section 3, Local Planning Policy refers only to LPs, SPDs etc. but not to key items of evidence base. I would perhaps ref. the local PPSs (as updated through the process) to ensure these were seen as a source of information to resolve the protect/provide issue around sports facilities?  | LDC & CCDC | No change proposed  |
| Sport England | Par 3.22-28 – CIL 123 lists include some sports infrastructure. Further clarity might be required to ensure delivery of onsite and offsite sports infrastructure is actually delivered as part of the development project. There is a risk that generic statements on CIL 123 lists (as opposed to specific project definition) could mean all sports provision might be mopped up via CIL contributions which may mean specific mitigation and provision cannot be secured via S106 agreements. It may be for example that CIL is used to help fund the big ticket items (such as a new leisure centre) whilst S106 is used for on/off site outdoor sports facilities.   | LDC & CCDC | Comments noted – infrastructure requirements will be considered as the development progresses |
| Sport England | Par 3.33 – cross reference to NPPF Par 73 Evidence Base (e.g. Playing Pitch Strategies) will be useful here and reference needs to be made to provision of outdoor sports space as well as the sports building.   | LDC & CCDC | Comments noted – Paragraph 3.33 will be amended   |

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| Sport England | <p>Par 3.34 –</p> <ul style="list-style-type: none"> <li>• The first sentence could read ‘to support sustainable development <b>and healthy active lifestyles</b>’.</li> <li>• The second sentence could read, ‘the proposals will be required to incorporate <u>provision</u> for open space, sports and recreation facilities in line with local policy <b>and evidence base</b>, incorporating playing pitches, <b>outdoor sports such as tennis courts, bowling greens and/or tennis courts</b>, equipped play, allotments <b>to meet new demand generated by new population within the development</b> and where possible <b>the retention</b> of any <b>existing temporarily disused</b> sports and recreation facilities that are <b>required to meet existing needs</b>. not justified to be <b>unless it is robustly demonstrated as being surplus</b> to requirements’.</li> </ul> | LDC & CCDC | Comments noted – Paragraph 3.34 will be amended   |
| Sport England | Par 4.15 – just a bit concerned that, apart from on the plans, this hub is not termed as being physically connected with the outdoor sports provision that it is designed to support.  | LDC & CCDC | Comments noted - Link between hub and outdoor sports provision can be strengthened              |
| Sport England | Par 4.24-25 – added to this it is really helpful for walking/cycling/running routes to have clear signage/environmental legibility (e.g. 2 miles to town centre taking 30 mins walk, 10 mins cycle etc. giving users an idea of how far/how long it will take) with cycle and locker storage and showers at key nodes and locations such as schools/employment sites etc. (see active design).   | LDC & CCDC | Comments noted  |
| Sport England | Par 4.29 – similar wording to 3.34 above. If existing sports facilities (even if they are temporarily disused) are to be lost there needs to be a clear evidence base, informed by the an up to date PPS/Sports assessment to demonstrate they are surplus to requirements to accord with NPPF Par 74/SE policy to protect playing fields.   | LDC & CCDC | Comments noted  |
| Sport England | Par. 4.47 – again the loss of a golf course to a country park may be interpreted as being supported here. The loss of the golf course would have to be demonstrated as surplus re. NPPF Par 74. Wording here should be more cautious. Figure 4.4 appears to assume the provision of a country park instead of the golf course – this should be corrected.  | LDC & CCDC | Discussions are ongoing with Sport England and other relevant parties in relation to this issue |
| Sport England | Development Layout – reinforce ‘Active Design’ implementation would be useful here.  | LDC & CCDC | Comments noted  |
| Sport England | Par 5.2 – whilst we support the appropriateness of an outline application, because NPPF Par 74 is a <u>restrictive policy</u> it will be important to demonstrate at outline stage   | LDC & CCDC | Comments noted - It is important that sport and recreation provision                            |

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|                          | that the whole sports club site, golf course etc. is either to be retained and restored OR detailed evidence provided to prove some or part of the existing sports facilities are surplus to requirements (based on robust evidence base) AND clear provision is to be made in terms of area/capacity/type (but not necessarily detailed layout) for new sports provision to meet the additional needs. If this is not clearly demonstrated we would have no choice but to object.   |      | will need to be demonstrated at the earliest stage of a planning application. |
| Stafford Borough Council | Stafford Borough is a neighbouring authority to Cannock Chase District and Lichfield District with Rugeley being in close proximity to a number of settlements within the Borough. Whilst it is noted that this scale of development will further increase the substantial employment areas of Rugeley it is considered that this complements the overall economy of Staffordshire, although there may be a limited outflow of economically active people from Stafford Borough to these new developments. Furthermore the level of traffic movements will inevitably increase due to the new housing and employment areas with further pressure on the existing road network through Rugeley, particularly from the Cannock Chase area.             | CCDC | Comments noted  |
| Stafford Borough Council | The Borough Council is generally supportive of the development principles, layout and design parameters in terms of re-using this significant brownfield site for new employment, housing and community facilities together with a new country park and significant areas of open space. However the vision could be further strengthened to explain the quality and type of place to be created. It is important to ensure that the overall aims of the project are supported, such as self-build which is an objective but does not appear to be re-enforced in terms of actual delivery. In addition the 'Development Principles' should provide more reference to high quality design and explain how this will be delivered by the development. | CCDC | Comments noted  |
| Stafford Borough Council | Turning to the 'design parameters' the current proposals show a Primary Access point along with potential secondary access points which must be delivered to ensure the development connects with surrounding areas rather than being a cul-de-sac. In addition the landscape buffer along the southern boundary of the site may lead to isolation of the development from the rest of the town rather than integrating with the existing settlement. Whilst some landscaping would be required it is important to provide strong linkages to the town centre and other areas.   | CCDC | Comments noted  |

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| Stafford Borough Council        | The Borough Council welcomes acknowledgement in the consultation document of the Cannock Chase Special Area of Conservation and the need to contribute to mitigation measures whilst also providing a Country Park and areas of open space.   | CCDC       | Comments noted |
| Stafford Borough Council        | Finally it is worth noting that proposals for High Speed 2, published in July 2017 within the 'High Speed Rail (West Midlands – Crewe) Plans & Sections Volume 1: Plans' would appear to be using part of the Rugeley Power Station site for power generation, facilitated by access routes for construction and maintenance, which may have an impact on the delivery timescales of the development proposals.   | CCDC       | Comments noted |
| Stafford Borough Council        | The Borough Council would welcome acknowledgement of this consultation response and a continuing updates on the progress of the Rugeley Power Station development approach in order to meet Duty to Co-operate requirements.  | CCDC       | Comments noted |
| Staffordshire Police (Scott, G) | <p><b>Re: Rugeley Power Station Consultation (Regulations 12 and 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012)</b></p> <p>Thank you for the above consultation document, I ask that Cannock Chase District Council consider my comments, which are made in accordance with;</p> <p><b>Section 17 of the 'Crime and Disorder Act 1998':</b></p> <ul style="list-style-type: none"> <li>places a duty on each local authority (Parish, District &amp; County Council): <b>'to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent crime and disorder in its area to include anti-social behaviour, substance misuse and behaviour which adversely affects the environment'</b>.</li> </ul> <p><b>National Planning Policy Framework:</b></p> <ul style="list-style-type: none"> <li>Paragraph 58<br/><i>'Planning policies and decisions should aim to ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.'</i></li> <li><b>Paragraph 69.</b><br/><i>This paragraph looks towards healthy and inclusive communities. The paragraph includes:-</i><br/><i>"Planning policies and decisions, in turn, should aim to achieve places which promote:</i></li> </ul> | LDC & CCDC | Comments noted |

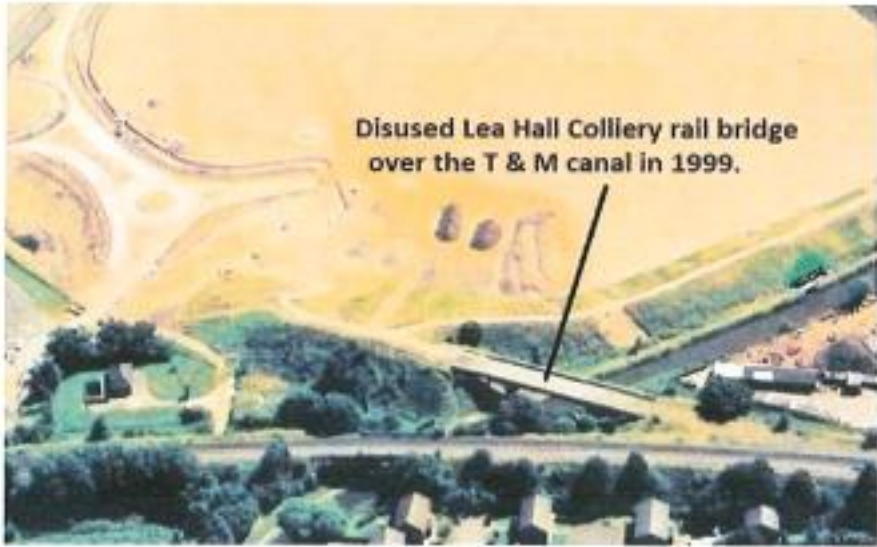


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|  | <p><i>Safe and accessible developments where crime and disorder, and the fear of crime, do not undermine quality of life and community cohesion”</i></p> <p><b>Cannock Chase District Council Local Plan Part 1 &amp; Design SPD Designing Out Crime Policy Local Plan (Part 1) Policy CP3</b></p> <ul style="list-style-type: none"> <li>• <i>Policy CP3 includes key design principles that includes;-</i><br/> <i>“The recent updates to housing standards brought in via the updated PPG and Building Regulations do now incorporate the dwelling-scale requirements of Secured by Design into mandatory Building Regulation requirements. As a result, the guidance for individual dwellings is no longer applicable”.</i><br/> <i>“Good design will give careful thought to how appropriate safety and security measures can be accommodated in a way sympathetic to the amenity of the local area.”</i><br/> <i>“The need to enhance crime prevention as part of new developments including building security and attractive design of surroundings (car parking etc.) to deter crime”</i></li> </ul> <p><b>The Human Rights Act Article &amp; Protocol 1, Safer Places: The Planning System and Crime Prevention and PINS 953.</b></p> <p>Staffordshire Police request that in order to prevent crime and reduce the fear of crime that this re-development attains Police Secured by Design (SBD) accreditation and that any public car-parks attain the British Parking Associations’ “Parkmark” standard award. There is no charge for my advice or for the Secured by Design award, and once awarded the Police SBD logo can be used on advertising material.</p> <p>Research shows that adopting SBD can reduce burglary by 50%, car crime and criminal damage by 25%, therefore the carbon costs of replacing door-sets and windows on SBD accredited developments as a result of criminal activity is more than 50% less than on non SBD developments, <i>installing SBD approved products cost 0.2% of the total build cost.</i></p> <p>Secured by Design will support the consultation documents aim in;</p> |  |  |
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|                        | <p><b>Delivering a wide choice of high quality homes</b> – where residential development is involved, a range of homes should be delivered which incorporate a mix of housing to meet local needs including the provision of affordable homes;</p> <p><b>Requiring good design</b> – achieving high quality and innovative design, stressing the importance of local distinctiveness and sustainability;</p> <p>Further information on Secured by Design and accredited security products can be found at <a href="http://www.securedbydesign.com">www.securedbydesign.com</a>, further information relating to “Parkmark” can be found at <a href="http://www.parkmark.co.uk">www.parkmark.co.uk</a></p> <p>I trust the constructive observations I have made will be useful to the Planning Committee in considering the application.</p>   |      |  |
| Stokes T (Lakeside FC) | <p>Following the closure of Rugeley Power station leisure facilities and the difficulties encountered by Lakeside FC in finding suitable pitches for training and matches, I contacted Amanda Milling MP for assistance. The early discussions between the Power Station, CCDC and Sports England did not include any representative of Lakeside FC. (Power Station Sports &amp; Leisure club have never managed Lakeside FC).</p> <p>I was informed by Ms Milling of the Rugeley Power Station Development Brief - Supplementary Planning Document, a Cannock Chase District Council &amp; Lichfield District Council joint review which includes leisure facilities which ends on 4<sup>th</sup> September 2017 so I submit the following for your consideration.</p> <p>I know the council need to provide leisure facilities for all the population but my concern is the lack of suitable, secure pitches of a standard acceptable to governing bodies (i.e. Football Association) especially when teams achieve a higher level of ability (between 2013 and 2016 Lakeside had 2 teams in the Midland Junior Premier league) and also meet the requirements for <b>the 6 different size pitches</b> for different age groups.</p> <p>The council already run two standards of pitch.</p> <ol style="list-style-type: none"> <li>1 Leisure centres like Cannock and Rugeley, which have associated facilities such as artificial turf and the Bradbury Lane site, Hednesford, although</li> </ol> | CCDC | Noted – these matters are under discussion with the relevant parties. CCDC is currently updating its Playing Field Strategy. |

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|            | <p>these are predominately used as training facilities. When completed the new stadium in West Chads Moor will increase the number of 'match' pitches.</p> <p>2 Numerous pitches, open to the public at all times except when in use by teams which have hired them.</p> <p>Some may have changing rooms, like Green Lane in Rugeley and Heath Hayes Park but the grounds are totally unsecured and open to misuse and fouling by dogs. I propose an intermediate standard which can be hired by a limited number of clubs on a time shared basis. These would require security fencing and include changing rooms with showers and CCTV. Larger clubs, like Lakeside could be approached, together with any other club using the same facility to form a joint 'caretaking' committee to cover opening, cleaning &amp; general maintenance of the facilities, with the hire costs representing the percentage of use and the level of contribution to its upkeep, which will in turn help to reduce council revenue costs.</p> <p>Each club could then provide suitable storage containers for their own equipment. With the assistance of the clubs it may be possible to attract funding from the Football Foundation and Sport England for the initial build and the clubs can also apply for ongoing support, including from Staffordshire FA. The number and location of these pitches will depend on the location and size of suitable clubs, all of which can be part of the council's plan to "refresh its Indoor and Outside Facilities assessment" over the next 12 months.</p> |      |   |
| Thornton H | P32 Para 4.6. The proposed residential development should include suitable housing / bungalows / sheltered accommodation close to a bus route to meet an already known local need for the elderly including those who may wish to downsize and free up larger dwellings. The huge numbers of new dwellings already built, or about to be built up to 2028 in the Rugeley area will eventually result in a much greater need for such accommodation.  | CCDC | Achieving a balanced housing mix will be a requirement of the development in line with the adopted plans of both authorities. |
| Thornton H | P32 Para 4.11 & P34 Para 4.27. It would be extremely unwise to retain the exiting railway to the Power station as it is unlikely to be needed for the type of employment envisaged and if it remains and is unused it would take up valuable employment land, and the railway with its embankment and bridge over the Rugeley bypass would   | CCDC | Comments noted - this matter is being explored  |

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|                   | <p>become a liability for future maintenance. It is therefore vital that everything connected with the railway should be removed at an early stage as part of the Power station decommissioning and land reclamation. It is worth mentioning that a short length of the railway to the nearby lea Hall colliery was similarly retained, including a bridge, with embankments, over the T&amp;M canal, the bridge is now completely useless and deteriorating with no funding available for maintenance or to meet whatever will be the increasing cost of having it removed see aerial photograph</p> |             |  |
| <p>Thornton H</p> | <p>P34, Para 4.29 &amp; P36 Para 4.47. The golf course could justifiably be retained as no equivalent facility is now within the Rugeley area – St Thomas’s golf course at Hawkesyard (Page 6 Para 2.7) closed last December and its future is very uncertain. The last 13 holes of the part of the golf course on the flood planning should be fully integrated with the first 5 holes, at a higher level, after removal of the intervening railway lines.</p>   | <p>CCDC</p> | <p>Discussions are ongoing between the relevant parties and with the Environment Agency regarding the role of the land</p> |
| <p>Thornton H</p> | <p>P37 Para 4.50. My strong opinion is that the design strategy should ensure that in the Rugeley area the delivery of more dwellings should not be allowed to run ahead of the provision of suitable local employment land, as is the case at present – almost no local</p>  | <p>CCDC</p> | <p>The phasing of the site and delivery of the site will depend on evidence as it emerges</p>                              |



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|             | employment land has become available since the Towers site was almost filled to capacity some 4 years ago. This is important as already the occupants of the hundreds of dwellings now being built locally are mostly having to commute to other areas for suitable work, and it appears that most employment land on the Power Station site is unlikely to become available for at least another 3 years. In addition, P33, Para 4.18 reads: 'A key principle of the development is to create a sustainable development which reduces car dependency....'   |      |   |
| Thornton H  | P37 Para 4.51 Figure 4.4. The grey area described for 'Mixed use' is somewhat vague, may I suggest it is described as 'Predominantly for Employment' as it contains the 132KV indoor substation along its SW side and will be dominated by the 132/400KV outdoor substation on the whole of its NW side.   | CCDC | No change proposed – the SPD is intended to be flexible in its approach.  |
| Thornton H  | The large flooded borrow pit could almost immediately be made available, possibly as a commercial enterprise for its present / recent uses of fishing and sailing, particularly as a published power station leaflet of June 2008 estimated that, (because of its depth) '160,000 lorry journeys' would be required to fill it for other uses. It is worth mentioning that when the borrow pit was created circa 1960 it completely destroyed what remained of the 14 <sup>th</sup> century moated Hawkesyard Hall, an ancient monument, which was abandoned in 1760 when replaced by the present Hawkesyard Hall (Spode House). The exact location of the medieval hall can be found on the 1:2,500 scale 1923 edition of OS map XLV1.9. The ancient tree-lined hollow Hawkesyard lane along the east side of the borrow pit was the means of access to the medieval hall and may contain archaeological remains. | CCDC | The SPD seeks to retain the borrow pit as a key water / landscape feature |
| Till P      | This site is an industrial site and should be kept as such.<br>Option one =Keep the Power Station running on gas, and run by the private sector.<br>Option two = Its reutilisation should be for manufacturing and industrial purposes only. I feel it is important to bring back and encourage this aspect to give the future generation a chance to get them off the dole and the opportunity of a career.<br>This is an import decision and the right one must be taken to improve and put Rugeley on the map for the right reasons.  | CCDC | Comments noted  |
| Weightman R | A lot of focus is given to the younger generation when it comes to new redevelopments. I understand the need for housing and that the youngsters are the future of the area but we must not forget the older generation.   | CCDC | Comments noted – the SPD seeks to encourage a balanced housing            |

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|  | <p>Within the new housing structure could we not see much needed properties to house the older generation. For example: bungalows. People could purchase / rent a smaller property especially a nice little bungalow in a safe area therefore freeing up much needed houses of which could house a family.</p> <p>We also have the need for Residential and Specialist care homes.</p> <p>Could there be a nice garden area so that people could go and sit and feel safe. I know there are parks but sometimes the elderly feel intimidated walking or sitting in a play area. There are some lovely water features on the Power Station site.</p> <p>Please remember the older generation, they are as entitled to consideration as most.</p>  |             | <p>mix to provide for all needs in line with adopted plans.</p>  |
| <p>Friends of Cannock Chase</p>                | <p>Having examined the plans for the Rugeley Power Station site the details were discussed at our meeting this evening. Our main concern is the retention of corridors for the wildlife that exists in the areas especially along the canal and river courses. It is noted that there are water voles, newts, bats, some rare birds and other species there. Many of these species are in decline due to loss of habitat. It is therefore imperative that the developers recognise the importance of retaining habitats. We are alarmed at the removal of trees which affect landscape, habitat and help minimise pollution. Removal should be at a minimum and replacement trees planted.</p> <p>The proximity to historical sites is noted. These must be protected at all times.</p> <p>With 800 dwellings being created it is felt that more schools, doctors etc will be needed. Transport links should also be provided from the site to connect to Rugeley town and railway stations.</p> <p>We would be interested in the results of any further research carried out on the site.</p> | <p>CCDC</p> | <p>Comments noted – infrastructure requirements will be considered further as the development progresses.</p> <p>Any planning application for the site will need to be supported by a range of technical evidence including ecological surveys and a transport assessment.</p> |
| <p>Brereton &amp; Ravenhill Parish Council</p> | <p>Thank you for consulting on this important draft SPD. I support in principle the redevelopment of this site for a mixture of uses, recognising that the alternative is likely to be development of greenfield land. I am however concerned that the full cost of infrastructure is met by section 106 deeds of planning obligation, Community Infrastructure Levy, or both. This includes (but is not limited to) schools, health provision, buses and policing and Brereton and Ravenhill Parish Council's provision of allotments and parish hall. With local primary schools at capacity, a new primary school is needed. I therefore welcome the references to provision of a primary school in paragraph 2.89's fifth indent and in paragraphs 3.32 and 4.16.</p>  | <p>CCDC</p> | <p>Comments noted</p>  |

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| Brereton & Ravenhill Parish Council | With the proximity of the site to the A51 and the West Coast Mainline (which in this location will in future carry those high-speed trains that serve Stafford), care will be needed to ensure that buildings (residential, employment and other) have good sound insulation.  | CCDC | Comments noted   |
| Brereton & Ravenhill Parish Council | We need employment provision, not least to facilitate businesses moving from Redbrook Lane and to prevent a repeat of the loss of JCB from the Rugeley and Brereton and Ravenhill area. Efforts should be made to preserve the private rail siding (paragraph 2.11) for use in connection with the proposed employment development. I therefore welcome paragraph 4.27 and the final sentences of paragraphs 4.11 and 4.45.  | CCDC | Comments noted   |
| Brereton & Ravenhill Parish Council | In order to reduce car dependency, there needs to be the employment provision mentioned above and a network of pedestrian and cycle routes. These should link with the canal towpath, which should be improved, so that it is usable by and attractive to people with pushchairs, disabled people (including those in wheelchairs) and cyclists. The inadequacy of the towpath in these respects and its need for improvement should be recognised, perhaps in paragraph 2.32. | CCDC | Comments noted – references to tow paths will be considered in relation to the wider site context        |
| Brereton & Ravenhill Parish Council | The absence of any mention of London in paragraph 2.33 is most surprising and suggests that the most up-to-date information may not have been used in preparation of the SPD.  | CCDC | Comments noted – SPD will be amended   |
| Brereton & Ravenhill Parish Council | The impact of the southern part of the site on the almost adjoining Trent and Mersey Canal Conservation will require careful consideration. Paragraph 2.18 should be expanded and strengthened to reflect this. Paragraph 2.25 is wrong. The Canal Conservation Area with its 18th-century canal and towpath is unquestionably a heritage asset. The draft should be amended to reflect this.  | CCDC | Comments noted – Comments noted – Reference to Conservation and Heritage will be strengthened in the SPD |
| Brereton & Ravenhill Parish Council | “Council’s” in paragraph 2.49 should read “Councils”.  | CCDC | To be amended  |
| Brereton & Ravenhill Parish Council | BRPC am concerned that paragraph 2.52 could facilitate too easy a removal of trees. It should make clear that this should only happen if fully justified by appropriate expert evidence.   | CCDC | Comments noted – Paragraph 2.52 to be strengthened   |
| Brereton & Ravenhill Parish Council | “Rugeley Train Station” in paragraph 2.81 should read “Rugeley Town Station  | CCDC | To be amended  |

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| Brereton & Ravenhill Parish Council            | Figure 2.10 should include the following (which are at present omitted): Brereton and Ravenhill Parish Hall in Ravenhill Park; Newman Grove allotments, Ravenhill; Brereton Methodist church on Brereton Main Road; and the Co-op supermarket in Redbrook Lane.  | CCDC | Comments noted – SPD to be updated to take account of these comments            |
| Brereton & Ravenhill Parish Council            | BRPC welcome the references to “Opportunity to create country park/wildlife corridor” in figure 2.14 and the corresponding annotation in figure 4.4. Despite the proximity to the River Trent of the Rugeley and Brereton and Ravenhill built-up area, there is, at present, hardly any opportunity for local people to enjoy the river. | CCDC | Comments noted  |
| Brereton & Ravenhill Parish Council            | BRPC am aware of the current CIL rates and hopes that these will be extended to betting shops and other premises where substantial gambling takes place.   | CCDC | CIL rates have been set at examination  |
| David Dundas                                   | 1.2 If a boiler is available during decommissioning/demolition and is suitable to power the historic Cornish beam engine located in the Sandfields pumping station on the south side of Lichfield, the Lichfield Waterworks Trust would be very grateful to receive it.  | LDC  | Comments noted  |
| Bryan Wilson                                   | 2.5 Allotments have been given a three year reprieve, this should be extended if CILs are firm in their belief that Allotments will be retained  | LDC  | The SPD seeks to retain allotments  |
| Bryan Wilson                                   | 2.52 Agree that many of the existing trees should be retained at all costs   | LDC  | Comments noted  |
| Bryan Wilson                                   | 2.3 Clarifies he was a Senior Engineer at RPS for 25 years   | LDC  | Comments noted  |
| Nicholas Dexter on behalf of National Grid     | Figure 2.15 The constraints map should include HS2 Phase 2a land requirements as NG 400kV substation is identified as a point of connection to electrify the new railway. This would include an extension to the substation, access arrangements, laydown and underground cables to the proposed railway.                                | LDC  | Comments noted - Reference to HS2 will be included in SPD                       |
| Nicholas Dexter on behalf of National Grid     | 4.4 HS2 Phase 2a hybrid bill identifies National Grid's 400kV substation as a point of connection to electrify the new railway. To facilitate this connection it is likely that the 400kV substation would need to be extended and there would be a cable / overhead line corridor connecting to the proposed railway to the north.      | LDC  | Comments noted  |
| Samantha La Planche on behalf of Armitage with | 2.13 & 2.14 Like to see all of the recreational facilities including sports & social club, golf course, railway siding, borrow pit being kept for use of local residents. These facilities have provided and in turn created many clubs and societies, which provide valuable recreational activities for the area and beyond.           | LDC  | Comments noted - SPD seeks to ensure there is a mix of facilities for residents |



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| Handsacre Parish Council  | Armitage with Handsacre Parish Council would seriously consider taking on these areas of land for recreation use   |     |  |
| Samantha La Planche on behalf of Armitage with Handsacre Parish Council | 2.49 Armitage with Handsacre Parish Council would seriously consider taking on these areas of land of recreational use.  | LDC | Comments noted   |
| John Machin   | 2.18 TPO should be protected, it provides a barrier and environmental corridor between the site and the A513   | LDC | Comments noted   |
| David Dundas  | 1.4 Site is located in Trent floodplain, is it sufficiently protected against flooding?  | LDC | LDC & CCDC are working the EA on issues relating to flooding       |
| John Machin   | 2.28 The application for a secondary access point off A513 to facilitate demolition works (Application Reference: 17/00453/FUL), cuts directly through the Environmental Centre car park and isolates the Classroom and Educational facility from access to the Borrow pit. This would hinder the development of Recreational Facilities and the reinstatement of the Educational facilities for the redeveloped site. | LDC | Comments noted   |
| John Machin   | 2.35 Support the Councils desire to maintain ecological aspect of the South and Eastern area of the site   | LDC | Comments noted   |
| John Machin   | 2.37 Borrow Pit provides ideal habitat for wildlife species  | LDC | Comments noted   |
| John Machin   | 2.41 Important to retain Landscape and Community features as once lost only a token gesture will be paid toward their requirements by any future developer   | LDC | Comments noted   |
| John Machin   | 2.46 The pit and its immediate surroundings have become an amenity and ecological asset and provided fishing for the sports and social club. This comment should be emphasised and form a strong foundation for providing ecological and recreational facilities within the re development.  | LDC | Comments noted - further ecological assessments will be undertaken |

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| John Machin  | 2.47 There should be no consideration for future planning application which seek to fill the Borrow Pit   | LDC | The SPD seeks to retain the Borrow Pit  |
| John Machin  | 2.48 The building used as an educational facility should be retained so it can be developed to be utilised as a communal hub  | LDC | Retention of amenity facilities needs to be considered in the context of what comes forward for development |
| John Machin  | 2.49 Welcomes the opportunity to play a key role in retaining the Borrow Pit as an amenity and hence strongly support the councils support to retain this aspect of the document  | LDC | Comments noted  |
| John Machin  | Figure 2.11 No permission on the Borrow Pit is encouraging as regards to its retention as an Ecological, Environmental and recreational asset.  | LDC | Comments noted  |
| John Machin  | 2.28 Supports the comments to retain natural assets and existing sports facilities where possible and retain the borrow pit as a landscape/ water feature/ recreational feature and to investigate potential to link school and community facilities on site. | LDC | Comments noted  |
| David Dundas | 1.5 Will building plots for self build housing be available for local building companies to purchase, build on and re-sell  | LDC | The SPD encourages self-build   |
| John Machin  | Figure 2.14 Support the Country Park and Borrow Pit and restrict the development to the Ash Lagoon site. Also support the Community Hub as well as a prospective Education Centre where the existing Building is sited on the Borrow Pit Car Park.            | LDC | Comments noted  |
| John Machin  | Figure 2.15 Supplementary access is superfluous to requirements as an existing access has been used satisfactorily for many years   | LDC | An application is being considered for a secondary access to facilitate demolition                          |

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| John Machin    | 3.1 Supports the comments to ensure the protection and enhancement of ecological interests including the management and future maintenance of landscape and important recreation features   | LDC | Comments noted |
| John Machin    | 3.21 Armitage with Handsacre Neighbourhood plan specifically seeks to retain the Borrow Pit as a an Environmental Asset to the Community  | LDC | Comments noted |
| John Machin    | 3.34 Borrow Pit fits within this scope and should be retained   | LDC | Comments noted |
| John Machin    | 4.29 Support the Councils intention to retain and protect existing facilities   | LDC | Comments noted |
| John Machin    | 4.34 Support the inclusion of this clause and would seek to assist the existing users of the facility in their proposals to retain the Borrow Pit in the redevelopment plans  | LDC | Comments noted |
| John Machin    | 4.37 Supports the Councils desire to include this in the planning document 'the retention of the Borrow Pit and the adjacent landscape features'  | LDC | Comments noted |
| John Machin    | 4.46 Fully support the retention of this clause   | LDC | Comments noted |
| John Machin    | 4.5 Fully support the provision to retain natural assets and sports facilities  | LDC | Comments noted |
| David Dundas   | Figure 2.6 The resolution of the image is not good  | LDC | Comments noted |
| John Machin    | Figure 4.4 Support the plan but would encourage the buffer to be extended to the perimeter of the site at the southern end where the A513 abuts to the existing perimeter security fence.   | LDC | Comments noted |
| John Machin    | Table A.1 Encouraged to see Policy CP10 through to NR4 are included and supports this   | LDC | Comments noted |
| Ian Garfield   | 2.46 Borrow pit was a successful trout fishery with over 100 active members. I was a member for over 7 years and thoroughly enjoyed the fishing, missing it greatly since it was sadly closed down. Along with the attached lakeside amenities it was a lovely venue for fishing. It would be great to see it opened once more as a trout fishery accessible to members of a club to fish for trout using flies only. | LDC | Comments noted |
| Ian Garfield   | 2.49 I was a member of the RPSC angling section for over 7 years and loved fly fishing there, it was a great venue and it would be great to see it reopened. I and I know many others miss the facility greatly, there are few comparable fisheries nearby.   | LDC | Comments noted |
| Edmund Bennett | 2.3 Opportunity exists to develop cycle-ways and pedestrian access throughout the open areas of the site, and along the banks of the river; as a social amenity   | LDC | Comments noted |
| Edmund Bennett | 2.42 Social Club provided some unusual and valuable resources within the site. Strongly arguers the model railway group be consulted as part of the development plan, with a desire to keep the group resident in the site.   | LDC | Comments noted |

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| Edmund Bennett   | 2.43 In a mixed development such as this plan, leisure facilities should be retained where possible, to provide such opportunities to new residents and existing local groups. On the current site dedicated space and developed facilities could be easily be embraced within the development plan. Urges LDC to consult with groups   | LDC | SPD seeks to achieve a balance of mixed uses including leisure and recreational facilities.             |
| Edmund Bennett   | Refer to comments in 2.44 and 2.45  | LDC | Comments noted  |
| Edmund Bennett   | 2.47 Ground conditions which led to the abandonment of the pit by the power station because it filled with water, would undoubtedly make filling the pit for use as building land expensive and potentially unsafe  | LDC | Comments noted  |
| Edmund Bennett   | 2.49 Urge adoption of the Borrow Pit as a community resource for leisure and recreation. It adjoins section of the site already adopted as allotments within the development plan. Water supports a great deal of wildlife as an aside to the primary function of such a pool. Borrow Pit is a unique local resource to be treasured.   | LDC | Comments noted  |
| Terry Dell on behalf of RPS Society of Model Engineers | Paragraph 2.43 omits to include miniature steam railway in the list of existing facilities within the recreation area.<br>Request the in the SPD the miniature steam railway be included in the schedule of leisure facilities within the recreational area of the power station.<br>Ask to be included in plans to establish a 'Community Hub' and secure a future for the railway and workshops free from the constraints of operating within a secure area.<br>Along with providing steam train rides on a non-commercial basis, expect to be able to attract younger members to the facility. | LDC | Comments - will be amended to reference railway   |
| Edmund Bennett   | 2.16 As a energy storage facility of national significance (contributing to grid in times of stress) the security and integrity of this site will be important. How is the facility to be secured in order to prevent it becoming a place of interest to local youth, and potential terrorist risk?   | LDC | Security issues will be considered as part of the detail of development. See also Police representation |
| Edmund Bennett   | 3.34 The development of Model Railways; Bowling Greens, etc take many years to mature, and should not be lost   | LDC | Comments noted  |
| Paul Malone  | 2.12 Supports the retention of the Borrow Pit   | LDC | Comments noted  |
| Paul Malone  | 2.13 Supports the retention of the Borrow Pit   | LDC | Comments noted  |
| Paul Malone  | 2.35 Supports the retention of the Borrow Pit   | LDC | Comments noted  |
| Paul Malone  | 2.46 Supports the retention of the Borrow Pit   | LDC | Comments noted  |

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| Paul Malone      | 2.48 This action if ever it were to take place, would be a tragic event for the environment, the wildlife, the ecology. It takes decades to establish a mature pool such as borrow pit. It is one of the most diverse and natural water features that I have ever seen.   | LDC | Comments noted |
| Paul Malone      | 2.49 Supports the retention of the Borrow Pit   | LDC | Comments noted |
| Alan Nightingale | 2.46 Borrow Pit was transformed into a nature reserve with the inclusion of a purpose built environmental centre. It makes a great asset to the local community and would be a great loss should it be lost.  | LDC | Comments noted |
| Bryan Wilson     | Figure 2.3 There are many mature trees bordering the present open space of the former football pitches etc, to cut these down would be an act of sacrilege.   | LDC | Comments noted |
| William Allen    | 4.35 Situated near the boundary separating the two authorities, the Borrow Pit area will form a natural green break   | LDC | Comments noted |
| William Allen    | 4.38 Feel strongly that the borrow pit should be retained   | LDC | Comments noted |
| William Allen    | 4.47 Opportunity should be taken  | LDC | Comments noted |
| Brian Jones      | Figure 2.3 As a former member of the RPS fishing club I believe that the Borrow Pit and its surrounds should be designated an area of outstanding natural beauty. Its varied fauna & flora should be nurtured and protected for future generations that may live in the vicinity. It would be a great shame if the Borrow Pit were lost as the area is sadly lacking in this type of facility.  | LDC | Comments noted |
| Brian Jones      | Figure 2.3 As a former member of the RPS fishing club I believe that the Borrow Pit and its surrounding area should be designated an area of outstanding natural beauty. The wide variety of fauna & flora to be found there should be nurtured and protected for future generation that may come to live in the vicinity. If the Borrow pit were lost or drastically changed it would be a great loss as this type of facility are in short supply in this area. | LDC | Comments noted |
| Ian Garfield     | 2.43 Maintain the clubhouse and some of the sports facilities would be great. It is a valuable resource for the local community to use.   | LDC | Comments noted |
| Ian Garfield     | 2.48 This building was an Environmental classroom and resource, I remember the excitement of the children I took there back in the seventies as they took part in activities such as pond dipping and sorting through leaf litter to look for and identify bugs. It would be lovely to see it reused by future generations to gain valuable insights into ecology and the environment   | LDC | Comments noted |

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| Ian Garfield | 2.49 I believe that the pool was once used for sailing, that would be great to see again as long as it was organised as an affordable resource as opposed to some of the more costly local clubs.   | LDC | Comments noted |
| Ian Garfield | 2.35 It would be good to see the length of the River Trent on the site used for fishing   | LDC | Comments noted |
| Derek Lever  | 1.5 My connection with the Rugeley Power Station (RPS) Site goes back to 1965 when I took up appointment as a teacher at the Pear Tree Primary School, Rugeley and bought property first in Armitage and then in Brereton. I visited the Station many times as well as the adjacent Colliery and the Staffs CC Environmental Centre. There has always been a strong connection between RPS and both its environment and local community - the many and various facilities have benefitted 1000's of people over the years. I have played football and cricket and, latterly, for many years fished the pool known as Borrowpit Lake. It is good to note that the decommissioning of RPS will enhance the the area, in terms of accommodation and leisure - the two go together. Demise anticipates rise. It would be a tragedy if the Borrowpit Lake was lost - it is a beautiful, well maintained and accessible feature and surely will contribute to the lives of those who live in the new housing but also further afield - as it always has. It might seem that I comment for selfish reasons and it is true that I would hope to continue fly fishing. However, my comments are made for several reasons that can hardly be deemed selfish: maintaining and enjoying a beauty spot; retaining an environment for a range of creatures and plants that live above, on, beside and beneath the lake's surface; striking a balance between work and leisure and so much more. Those of us who have enjoyed and voluntarily maintained the lake and its environs would continue to do this, and welcome others to share the joy and pleasure we have garnered over time. Our membership of a fishing association continues and, hopefully, we will continue to look beyond the lake - to the beauty, the wellbeing of people and the future generally. Families need homes but they need space and places to enjoy all that nature can bestow. Once this lake is gone, it is gone. It cannot be re-established. Change can be profitable but it can also, as I believe in this case, be counterproductive and damaging. I humbly beg the decision-makers to vote to keep what is as part of the mixed use development referred to in this document as "the overall aim." | LDC | Comments noted |
| Bryan Wilson | 2.42 Only the Model Engineers have found it practically impossible to easily move house due to the fixed nature of their assets.  | LDC | Comments noted |

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| Graham Whittaker | 2.47 I would like to say that not only is fishing an enjoyable pastime for young and old it's also a meeting place a sort of talking place to meet up with people a lot of the fishermen are widowed and what a place to meet friends and watch the wildlife of which there's plenty of bird life as is stated badgers/bats /squirrels ect<br>So please give some thought to the people and wildlife in making your decision I hope that you make the right one .  | LDC | Comments noted  |
| Graham Whittaker | 4.3 I would like to say that not only is the fishing a really good pastime for both young and old/disabled everyone is welcome they would find a lot of people who are there to help or just chat a lot of the fishermen are retired and look to this as a meeting place as well as a pastime a lot of these elderly men live alone so enjoy the company it is also a place to just sit and watch the wildlife that's there it is truly a haven for the wildlife<br>So please make the right decision when it comes to voting for the sake of the community and the wildlife | LDC | Comments noted  |
| Peter Stockton   | 2.5 The current application for second access point to facilitate demolition work from A513 is not required and would damage the Educational facilities by cutting off Borrow Pit from the main environmental building. There is already access as mentioned in paragraph 2.27   | LDC | Application has been submitted and is being considered to facilitate demolition |
| Peter Stockton   | 2.29 This area should be protected as part of the environmental resource that is mentioned later in the document, and any planning applications should be mindful of this resource. It provides a barrier and environmental corridor between the site and the A513.  | LDC | Comments noted  |
| Peter Stockton   | 2.18 The Ecology of the site should be seen as an on going ecological asset, and I support the Councils desire to maintain this aspect of the South and Eastern area of the site.  | LDC | Comments noted  |
| Peter Stockton   | 2.36 The Borrow Pit and land surrounding it provides the ideal habitat for wildlife species, and a corridor to the Trent System for Otters as well as vital habitat for all the other species mentioned.   | LDC | Comments noted  |
| Peter Stockton   | 2.38 The Landscape and Community features should be kept as once lost, only a token gesture will be paid toward their requirements by any future developers who will seek to develop even further.   | LDC | Comments noted  |

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| Peter Stockton | 3.21 I fully support The Armitage with Handsacre Neighbourhood plan which specifically seeks to retain the Borrow Pit as an Environmental Asset to the Community.  | LDC | Comments noted |
| Peter Stockton | 3.21 I fully support The Armitage with Handsacre Neighbourhood plan which specifically seeks to retain the Borrow Pit as an Environmental Asset to the Community.  | LDC | Comments noted |
| Bryan Wilson   | 2.43 The four activities grossly misrepresent the club activities - bar activities, snooker, table tennis, meetings, dancing and variety acts. Outside were model boating, coarse and fly fishing, miniature railway and many more activities. | LDC | Comments noted |
| Peter Stockton | 4.29 I fully support the Councils intention to retain and protect existing facilities  | LDC | Comments noted |
| Peter Stockton | 4.34 I fully support the inclusion of this clause, and would seek to assist the existing users of the facility in their proposals to retain the Borrow Pit in the redevelopment plans.   | LDC | Comments noted |
| Peter Stockton | 4.37 I fully support the Councils desire to include this in the Planning Document. "The retention of the Borrow Pit and the adjacent landscape features"   | LDC | Comments noted |
| Peter Stockton | 4.46 I fully support the retention of this clause  | LDC | Comments noted |
| William Allen  | 2.4 An undeveloped space should remain at the boundary of the two Districts  | LDC | Comments noted |
| William Allen  | Figure 2.3 The Borrow pit and immediate surrounds should be retained as a green buffer between the two authorities   | LDC | Comments noted |
| William Allen  | 2.38 The Borrow pit, with its spring fed clean water, is ideal wildlife sanctuary and supports myriad aquatic life.  | LDC | Comments noted |
| William Allen  | 2.47 Should be retained as buffer and for amenity/ wildlife value.   | LDC | Comments noted |
| William Allen  | 2.49 Should also be retained for local amenity value   | LDC | Comments noted |
| William Allen  | 3.8 Borrow pit area should be retained for amenity value. Development might not be straightforward owing to large volume of spring sourced water.  | LDC | Comments noted |
| Bryan Wilson   | 2.45 The Model Engineers through their own efforts to date have managed to retain a toe hold on site in the hope that Councillors support these interests.   | LDC | Comments noted |



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| Edmund Bennett | <p>2.48 Building could be integrated into a development plan for the Borrow Pit and immediate environs. Allotment area may be able to have use but my comments regarding the development of the Borrow Pit as a fishing and leisure facility may help define uses of this building.</p> <p>Concerned about the application for the southern access road, which in plan seems to cut directly across the building and parking area for the building adjacent to the Borrow Pit. This will undoubtedly affect the ways in which the pool (and maybe allotments) can be used or accessed.</p>   | LDC | Comments noted  |
| Rich Prozak    | <p>Rugeley needs a social hub for people to go, with a cinema, shopping complex eateries and things for the evening. The river trent would attract café bars, eateries, leisure and tourism. The river would open up a whole new avenue of possibilites. If the site becomes housing people will just use the town as a base and go elsewhere.</p>   | LDC | <p>Site will be developed in line with adopted local plans and neds to protect vitality of Rugeley Town Centre.</p> <p>It is agreed the River Trent is an asset</p> |
| Bryan Wilson   | <p>Model Engineers negotiated 6 month extension to remain on site in the form of license agreement. It became obvious the railway could not be up routed in 6 months so it was agreed the railway would not be removed just personal and ancillary equipment. Requested an extension to the license primarily to continue looking after the grounds on which it sits as consider they the railway is an asset too good to let go.</p> <p>Keen to maintain a presence on site and perhaps operate the railway on a non-commercial basis for the benefit of the people either already in situ on the 'Pippins' housing development or will be in the future.</p> | LDC | Comments noted  |
| A Smith        | <p>Agree Rugeley Power Station should be used to build 800 homes, 400 private homes and 400 rented homes to include a school, shop, pharmacy, doctors surgery. With access to public transport to Rugeley Trent Valley Train Station and Rugeley Town.</p>   | LDC | Site will seek to achieve a balanced housing market   |
| Julie & Gary   | <p>The development of the Power Station is a golden opportunity to enhance the area and add to the beauty of the surrounding areas. Accepts there should be some housing on the site but urbanisation of the town should be minimised and the site's recreational facilities retained. A country park would be ideal. This is a unique opportunity so think of the future of the town not just meeting current targets.</p>  | LDC | Comments noted  |

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| Philip Smith                            | Supports retention of the Borrow Pit for its environmental qualities and the preservation of the varied wildlife.  | LDC        | Comments noted  |
| Alison James<br>(Colton Parish Council) | Clarify what the infrastructure provisions are to be, in terms of schools and doctors. Concern that the catchment schools are thought to be well oversubscribed already and getting healthcare appointments in Rugeley is dire. Adequate provision needs to be made in terms of infrastructure to support the new development so that it doesn't cause a deterioration in services for existing areas.   | LDC        | Comments noted – infrastructure requirements will be considered as part of the future development |
| James Chadwick<br>(SCC)                 | <p><b>Ecology</b><br/>2.35 – 2.39 refer to ecology but fail to make it clear to potential developers what survey and assessment is required. Habitat survey and preliminary ecological assessment should be required for the full site, rather than making assumptions that only the “green” areas support biodiversity interest. For example land along the southern edge of the site along the A51 support species-rich grassland with a large colony of bee orchids (rare in Staffordshire). Assessment of impacts on ecology need to consider off-site impacts – for example to a large off-site bat maternity roost thought to use power station habitats at the Borrow Pit for foraging, and species using the River Trent.</p> <p>There is a substantial opportunity to deliver biodiversity enhancement through re-development of this site that contributes to the UK Biodiversity Strategy, the Staffordshire Biodiversity Action Plan and Cannock Chase and Lichfield District Biodiversity Opportunity Maps. It is therefore disappointing that s.2.89 refers only to retention “where possible” of natural features. A more ambitious and sustainable approach to biodiversity would be welcomed and would be more in accordance with the NPPF . It is noted that the Lichfield Local Plan Concept statement referred to in s.3.10 indicates that enhancement for biodiversity would be required. In regard of the Design Principles it might be helpful if the sections on Open Space &amp; Green Infrastructure and Ecology &amp; Biodiversity were better integrated to specify creation of a green infrastructure framework that incorporates and links existing features and provides enhancements for biodiversity. Reference to habitat creation as well as tree planting and measures for species would indicate more clearly the potential for</p> | LDC & CCDC | Comments noted - SPD will be strengthened to take account of these issues                         |

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|                      | <p>substantial biodiversity enhancement on this site situated within the key landscape corridor of the River Trent.</p> <p>The Development Layout section fails to give clarity regarding delivery of green infrastructure. A green infrastructure strategy for the site may be a means of ensuring delivery of good quality multi-functional greenspace that incorporates ecological connectivity and biodiversity enhancement. The limited ambition in s.4.50 that a design strategy is required that “Seeks to retain natural assets...” is unlikely to deliver good quality greenspace or biodiversity protection let alone enhancement. The Figure 4.4 concept of a Country Park in the current golf course location is welcomed and provides potential for substantial biodiversity enhancement but this is not reflected in SPD text. Section 5.0 requirement for a green infrastructure strategy (linked to the phasing information required by s.5.8) as part of an outline planning application would be helpful in ensuring that piecemeal development does not result in erosion of landscape and biodiversity interest but delivers the enhancements that this site has potential for and is in accordance with Lichfield Local Plan policy NR6</p>  |            |   |
| James Chadwick (SCC) | <p><b>Historic Environment: Archaeology and Historic Landscape Character</b></p> <p>2.22. The Staffordshire Historic Environment Record (SHER) has yet to receive a copy of the Archaeological Desk Based Assessment referenced in this section. It is requested that a hard copy and a CD Rom version be submitted for inclusion on the SHER at the earliest opportunity.</p> <p>2.22. The Staffordshire County Council Historic Environment Team have briefly discussed the extant buildings of the Rugeley Power Station complex with colleagues from Historic England and are aware of their advice regarding the significance of the cooling towers; the need for the developer to record the site ‘in line with best practice and in accordance with NPPF’ is acknowledged. Bearing in mind that the site contains no designated heritage assets, advice regarding historic environment mitigation falls within the remit of the Local Planning Authority (LPA) and their historic environment advisors as part of the NPPF process. In this instance this will be the LPA Conservation Officer and the Staffordshire County Council Historic Environment Team (as archaeological advisors to the LPA). These specialists and not Historic England will</p> | LDC & CCDC | Comments noted - SPD will be strengthened to take account of these issues |

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|  | <p>advise regarding the nature, scope and scale of archaeological and historic building surveys across the site as part of the planning process at either a pre-application stage or following the submission of planning permissions for the site.</p> <p>2.22. As the consultation document does not include links to the archaeological Desk-Based Assessment it is not clear how archaeological potential has been addressed across the site. It should be noted however that (in spite of likely substantial below ground impacts from the construction of the power station) there does remain the potential for below archaeological remains to be present across the site; this would include the potential for palaeoenvironmental remains associated with the nearby River Trent. Bearing in mind the scale of the proposed scheme there should be the recognition here that staged archaeological evaluations to better understand the significance of any below ground archaeological remains present and to inform discussions regarding 'next steps' may be required by the LPA.</p> <p>2.24. It is understandable that the document details the designated heritage assets in the general area of the site. However, there are also undesignated heritage assets across the site as recorded on the HER or consider the broad archaeological or historic character of the site and its environs, which are not covered; instead it references 'low-moderate' heritage asset significance as identified in the Rugeley HECZ (10). A number of historic farmsteads (PRNs 50123 &amp; 50125) are recorded within the boundary of the site as well as an area of post medieval (and potentially medieval) squatter settlement (PRN 50124) at Langley Common (within the site boundary). Finally, on the opposite back of the River Trent the HER records the presence of a pair of possible ring ditches (PRNs 05216 &amp; 05258), these may be evidence for late Neolithic or Bronze Age burial activity and may indicate the potential for further similar archaeological sites to the south of the Trent.</p> <p>2.25. Future dialogue with the applicants' historic environment advisors is to be welcomed. It is advised that this be undertaken at the earliest opportunity to discuss likely next steps to better understand the scope and significance of heritage assets (both below ground and upstanding) across the site.</p> |  |  |
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|                             | <p>Figure 2.14. This figure identifies the potential for the creation of ‘Country Park/Wildlife Corridor’ flanking the River Trent in the northern portion of the site. While this is to be welcomed and its introduction could potentially preserve archaeological remains in situ, an area of a post-medieval water meadow system (PRN 54830) does occupy most if not all of this corridor. While not statutorily protected it is recognised as a heritage asset and would therefore be considered as part of any future application for the site. Any proposals for this area would need to consider the potential for the presence of water meadow features such as structures (culverts, bridges) and features (banks/panes and leats) to survive. There are however also opportunities for this areas historic character to inform the ‘development’ of this area of a Country Park or Wildlife Corridor as well as opportunities for the interpretation of the historic environment as part of a broader public engagement strategy for the whole site.</p>   |                       |                       |
| <p>James Chadwick (SCC)</p> | <p><b>Minerals and Waste</b></p> <p>It is noted that Paragraph 2.47 refers to the planning permission <a href="#">L.07/08/856 W</a> for infilling the borrow pit, which was first granted in December 2007. This permission was subsequently extended in October 2010 for a further 3 years (<a href="#">L.10/10/856 W</a>), but has now expired. This was confirmed in our response to an application to discharge conditions (<a href="#">L.10/10/856 W D1</a>) in October 2013.</p> <p>Our records also show that a small area of the site, in the vicinity of the cooling towers, also benefits from planning permission for the Materials Recycling Facility (<a href="#">CH.06/03/736 W</a>), which was permitted in June 2006. The site processes ash from the power station to manufacture concrete blocks and other construction materials. Whilst the operation would appear to be dependent on the power station for its raw materials, future of this permission should be addressed within the SPD, especially as substantial stockpiles of ash may remain on site.</p> <p>Paragraph 2.74 correctly states that the site falls within a Mineral Safeguarding Area for Superficial Sand and Gravel. Paragraph 144, of the <a href="#">National Planning Policy Framework (NPPF)</a> and Policy 3 of the <a href="#">Minerals Local Plan for Staffordshire (2015 – 2030)</a>, aim to protect mineral resources from sterilisation by other forms of development. However, the document suggests that the proposed redevelopment may be exempt under the</p> | <p>LDC &amp; CCDC</p> | <p>Comments noted</p> |

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|  | <p>details of Policy 3.2. This refers to a series of exemptions listed in Table 6, Appendix 6, of the Plan. While it is clear that the adjacent housing development, and the borrow pit area, are identified in the Lichfield District Local Plan as a Strategic Development Allocation, and would fall under Exemption 3 (Applications that are in accordance with the development plan where the assessment of site options took account of potential mineral sterilisation), the main area under consideration in this SPD would not have the same benefit.</p> <p>It is recommended that, as part of the development of the Rugeley Power Station Development Brief, an assessment is carried out to determine the existence, the quantity, the quality and the value of the underlying or adjacent mineral resource. It is likely that this can be prepared on the basis of drilling and other site investigations that have already been carried out.</p> <p>Finally, the site clearance and remediation will inevitable give rise to substantial quantities of waste materials. We would encourage every effort to maximise the beneficial use of this material, ideally through recycling as a secondary aggregate which can reduce the demand for newly extracted sand and gravel. Where this is not possible, the material would be valuable for use in the restoration of mineral workings in the area.</p> |  |  |
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### Internal Comments Received

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| <p>CCDC<br/>Environmental<br/>Health</p> | <p><b>Land Contamination</b><br/>Given the historic use of the site, there is potential for ground contamination and ground gassing issues, as acknowledged in the SPD. The document states that work is ongoing to evaluate the situation and that commercial use is unlikely to require remediation. However, whilst commercial land use does pose a significantly lower risk than other land uses, it is still essential that site investigation evidence is provided to confirm that harmful pollutant linkages are unlikely to occur during both the development and operational phases. The Environmental Protection Section will expect to be consulted on land contamination issues throughout the development of the site.</p> | <p>CCDC</p> | <p>Comments noted - these issues will be considered as work on the site progresses further</p> |
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|                           | <p>It is noted that possible extension of allotment provision is being considered. Allotments require a lower levels of soil contamination than other uses, so evidence should be provided to demonstrate this. It is common practice to source soil from on sites, so I would advise that clean areas of soil for this use are identified at an early stage.</p>   |      |   |
| CCDC Conservation Officer | <p><b>Historic Environment</b><br/>The Trent and Mersey Canal Conservation Area is stated as being c300m south of the site, however whilst this is true generally the site virtually adjoins the Canal at the south eastern end within Lichfield District. The potential for development on the site to impact on the setting of the CA will depend not only on proximity but on the size/height of any development. Therefore I don't think we can categorically say at this stage that 'it is not considered that the development of this site will have a significant impact on heritage assets.'</p>  | CCDC | Comments noted - the SPD will be strengthened to take account of these issues |
| CCDC Conservation Officer | <p><b>Pedestrian and Cycle Routes</b><br/>The Canal towpath runs along the north side of the canal with access points at the A51 bridge, Wheelhouse Road, Love Lane and from the new residential development in Lichfield District. An additional footway/cycleway link to the towpath is proposed from the A51 at the north-west end of the Power Station site towards Love Lane. Such routes and enhancements in Cannock Chase District have been funded by S106 agreements and are at the design stage. These routes link to Rugeley Town Centre where the Cannock Chase Heritage Trail leads over the Chase to Cannock. A key element of the Rugeley Town Centre AAP is permeability for all sections of the community (Policy RTC10) and public realm enhancements (PolicyRTC9) and provide access to transport links and recreation. Potential paths along River Trent north of Power Station site?</p> | CCDC | Comments noted - the SPD will be strengthened to take account of this issue   |
| CCDC Conservation Officer | <p><b>Surrounding development</b><br/>This refers to the Towers Business Park in addition to the adjacent residential development but only mentions Lichfield District Council, so should be clarified by including mention of Cannock Chase Council.</p>   |      | Comments noted - SPD will be strengthened to take account of this issue       |
| CCDC Conservation Officer | <p><b>Opportunities and Constraints</b><br/>Opportunities could include:<br/>- potential to enhance the setting of the Canal CA, especially at the SE end of the site</p>   | CCDC | Comments noted - SPD will be strengthened to take account of this issue       |

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|                                 | <ul style="list-style-type: none"> <li>- potential to link into existing pedestrian/cycle routes</li> <li>- potential to create a landmark building to replace the cooling towers</li> <li>- TPO could be an opportunity rather than a constraint</li> </ul>  |      |   |
| CCDC<br>Conservation<br>Officer | <p><b>Policy Context</b></p> <p>Cannock Chase Council has prepared a Trent and Mersey Canal Conservation Area Appraisal 2012 for the section of Canal within Cannock Chase District and a Management Plan will follow shortly. This highlights its special interest and enhancement opportunities. The Power Station cooling towers are noted as a landmark subject of significant views from within the south end of the CA. Recommendations include pursuing opportunities for public realm improvements along the Canal, towpath surfacing and waterway edging (in conjunction with the CRT) respecting the semi-rural character of the southern section of the Canal, and appropriate signage linking the towpath to the wider footway/cycleway network in the surrounding countryside. New residential development on the Power Station site in Lichfield District is noted as likely to benefit from improved pedestrian links, providing an attractive route to Rugeley town centre. Lighting of new development close to the Canal should be designed to avoid light spill into the dark wildlife corridor.</p> <p>The CCDC Design SPD 2016 (correct title) highlights key local guidelines for this area – continue to promote the high quality design and landscape principles of Towers Business Park, especially along the A51 and canal frontages, with predominance of good quality planting; support retention of relatively tranquil character of adjoining rural landscape by continued buffering and management of the urban edge; consider views of landmark cooling towers contributing to distinct identity; enhance gateways using visual and environmental improvements to reinforce local identity; contribute to public realm improvements along Canal towpath to enhance access for pedestrians, cyclists and wheelchair/pushchair users and to environmental enhancement of corridor, with lighting kept to a minimum to reduce urban impacts.</p> | CCDC | Comments noted - SPD will be strengthened to take account of this issue |
| CCDC<br>Conservation<br>Officer | <p><b>Development Principles – Layout</b></p> <p>Para 2 states residential development likely to be towards the west of the site – shouldn't this be east?</p> <p>Could mention need to enhance setting of Canal CA as element in Design Strategy.</p>  | CCDC | Comments noted this will be corrected                                   |



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| <p>CCDC<br/>Environmental<br/>Health</p> | <p><b>Air Quality</b></p> <p>Whilst there are no air quality management areas (AQMA) in Rugeley, the ongoing development in the district and surrounds is creating cumulative increases in emissions to air; primarily associated with increased traffic. I would ask that traffic associated emissions are assessed, and proportionate developer contributions towards air quality mitigation measures are sought from developers. To this extent pollutant emission costs should be calculated, based on Defra’s damage cost approach utilizing guidance found at <a href="https://www.gov.uk/government/publications/green-book-supplementary-guidance-air-quality">https://www.gov.uk/government/publications/green-book-supplementary-guidance-air-quality</a> and <a href="https://www.gov.uk/air-quality-economic-analysis">https://www.gov.uk/air-quality-economic-analysis</a>. The document states that self build projects will be welcomed, but does not indicate the extent. Presumably these would be processed as individual planning applications. Consideration should be given to as to how these can be compiled to allow their inclusion.</p> <p>The government has recently released its ‘UK plan for tackling roadside nitrogen dioxide concentrations’, in which it sets out its intention that conventional diesel and petrol vehicle sales will be prohibited by 2040. It is likely therefore, that electric vehicle use will build up significantly well in advance of that date and therefore imperative that refuelling infrastructure is in place to cope with this change. I would encourage electric charging points to be provided to all domestic properties and to at areas of employment and other community facilities.</p> <p>The proximity, and inclusion of cycle and pedestrian access, to local amenities and employment is very much welcomed, as this will reduce the need for car journeys.</p> <p>I would encourage retention of the existing rail freight facility, as this will encourage rail haulage over road.</p> | <p>CCDC</p> | <p>Comments noted – the SPD will highlight the issue. This will be considered further as development continues</p> |
| <p>CCDC<br/>Environmental<br/>Health</p> | <p><b>Noise</b></p> <p>Part of the residential zoning may be in a noise environment that requires developers to provide an ‘acoustic design statement’ as described in the new ProPG document. Environmental Protection should approve of ASRs prior to development. This is to ensure that residents experience at tolerable level of noise within their properties and in amenity areas.</p>   | <p>CCDC</p> | <p>Comments noted - SPD will be strengthened to take account of this issue</p>                                     |

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|                                 | <p>Some parts of the employment zone are likely to experience elevated noise levels from road and rail sources. Use of office space can be vulnerable to an elevated noise environment, which can effect productivity. Again, good design should be encouraged at an early stage.</p> <p>It is noted that employment and residential zones have been separated within the site, which reduces the potential for noise nuisance to residents from employment activities. However, appropriate operational times may be required for businesses to prevent noise disturbance at anti-social times.</p>   |      |  |
| CCDC<br>Environmental<br>Health | <p><b>Environmental Permit</b></p> <p>The existing Environmental Permit, regulated by the Environment Agency, will be effective until the site is returned to the state it was in prior to use as a power station. This will control the environmental impact of decommissioning and demolition works, such as dust generation. It should also ensure that any significant land contamination caused by use as a power station is addressed but not impacts pre-dating that use.</p>   | CCDC | Comments noted - to be considered further as development progresses  |
| Mike Brown<br>(LDC DM)          | <p>The development principles p36 makes brief mention of the need to provide a suitable SUDs system but no mention of likely flood warning requirements / finished floor levels etc, that are a normal requirements of an FRA. Given this document hasn't been produced as yet I assume that this is the reason for a lack of detail, but it might be worthwhile mentioning potential likely mitigation requirements.</p>  | LDC  | EA advised on this matter  |
| Justine Lloyd<br>(LDC Ecology)  | <p>2.35 – 2.39</p> <p>The Ecology and Biodiversity Section appears to be assumptive in its conclusions. It is not clear what the evidence base is to support the statements in Section 2.35, it is unclear if a Phase 1 Habitat Survey has been conducted across the site and it is presumed that the quantitative assessment of the proposed developments biodiversity impact has yet to be undertaken. All areas (apart from hardstanding and buildings) contribute to the total biodiversity value of this site whether they are considered low, medium or high ecological value. It is recommended that a quantitative assessment be undertaken at the soonest possible opportunity so that the scheme (as proposed) can be displayed as achieving both 'no net loss' to biodiversity and 'net gains to biodiversity' or else amended so as it is capable of doing so.</p> <p>2.38 – The commitment to undertake updated protected species surveys prior to submission of any detailed scheme is welcome. However, it is incorrect to state that</p> | LDC  | Comments are welcomed and will be considered in the wider context of the site coming forward for development |

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|  | <p>any ecological impacts will automatically be ‘mitigated in advance’; such an approach is inconsistent with the ecological mitigation hierarchy, the adherence of which by any developer is enshrined with para 118 of the NPPF 2012. The hierarchy requires first that a developer first attempts to avoid any impact (through amendment of scheme or methods of works etc.), any impacts that cannot reasonably be avoided should then be mitigated against or, if that too is displayed to not be reasonably possible, compensated for.</p> <p><b>Waterways</b></p> <p>2.51 – This would of course be dependent on the conclusions of a protected species survey. For example, should great crested newts be found to be present in such waterbodies adherence to the mitigation hierarchy will be essential, including looking at measures of avoidance (should amendment of these features be considered to improve their surface water attenuation capabilities) prior to considering mitigation and compensation measures.</p> <p><b>Trees and Landscape</b></p> <p>2.54 –</p> <p>As noted previously a quantitative assessment of the proposed developments biodiversity impact must be undertaken as soon as is possible to do so. Such an assessment will display the post development on site minimum habitat establishment/management requirements (i.e. biodiversity value) that must be undertaken to allow for the development to not be in conflict with the requirements of the NERC ACT 2006, paragraph 118 of the NPPF 2012 and Policy NR3. This habitat creation will form an integral part of the developments ecological mitigation and must not be considered an afterthought of landscaping or else the likelihood of the development requiring an offsite biodiversity offset is increased.</p> <p>As such it can be considered likely that the development habitat creation/management requirements (set to a mandatory minimum as per policy NR3, NPPF 2012 and NERC Act 2006) will form a fundamental part of any landscape scheme and the location and design of all ecological compensative habitat, amenity planting and open space recreation must be carefully considered to allow each to achieve their desired outcomes and to ensure that compensative habitats are not degraded. As such consultation of Ecology Officers will be required within the landscaping scheme design process.</p> |  |  |
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|  | <p><b>Local Planning Policy</b></p> <p>3.10 – Key objective 2 should be worded more succinctly. It reads as if only landscaping and recreational facilities require management and future maintenance. It is recommended the sentence is broken into two and amended to deal with ‘ecology’ and ‘landscape and recreation’ separately. <i>E.g. For ecology: To ensure the protection, enhancement and creation of ecological features including the management and maintenance of such features.</i></p> <p><b>Development Principles: Ecology and Biodiversity</b></p> <p>4:36 – Again a potentially assumptive statement as it’s not clear what the evidence base is to support this statement without phase 1 data and known biodiversity unit calculations to demonstrate no net loss/net gains to biodiversity.</p> <p>4.37 – Tree planting is not necessarily the most appropriate option in terms of habitat creation and addressing net losses/net gains to biodiversity. Although some woodland planting may be appropriate in areas, this site is located within the ‘River Corridors’ section of the Lichfield District Biodiversity Opportunity Map and is also adjacent to the River Trent. Appropriate habitat that could be considered includes lowland meadow, marshy grassland and other associated habitats. Indeed Section 2.53 of this document references the River Meadowlands Landscape.</p> <p>Other measures that will need to be factored will be dependent on the outcomes of protected species surveys, which should form part of the evidence base and could potentially alter the design of any development scheme.</p> |  |  |
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