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Monday, 1 June 2020

Dear Sir/Madam

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

In light of the current Covid-19 pandemic and government advice on social distancing, the Economic Growth, Environment and Development (Overview & Scrutiny) Committee to take place on **TUESDAY, 9TH JUNE, 2020 at 6.00 PM** will be held as a virtual meeting and streamed online (further information is available on our website).

Yours faithfully

A handwritten signature in black ink, appearing to read 'Christie Tims', is written over a light grey circular stamp.

Christie Tims
Head of Corporate Services and Monitoring Officer

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

Councillors Cox (Chairman), Ball (Vice-Chair), S Wilcox (Vice-Chair), Binney, D Ennis, Gwilt, Ho, A Little, Marshall, Parton-Hughes, Ray, Warburton and Westwood



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AGENDA

1. Apologies for Absence
2. Declarations of Interest
3. Minutes of the Previous Meeting 3 - 6
4. Work Programme 7 - 10
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6. Local Plan Review Update 93 - 288



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

11 MARCH 2020

PRESENT:

Councillors Cox (Chairman), Ball (Vice-Chair), S Wilcox (Vice-Chair), Binney, D Ennis, Ho, A Little, Parton-Hughes, Warburton and Westwood.

(In accordance with Council Procedure Rule No.17 Councillors Eadie and Pullen attended the meeting)

1 APOLOGIES FOR ABSENCE

Apologies for absence were received from Councillors Gwilt, Marshall and Ray.

2 DECLARATIONS OF INTEREST

There were no declarations of interest.

3 MINUTES OF THE PREVIOUS MEETING

The Minutes of the previous meeting, as previously circulated, were approved as a correct record and signed by the Chairman.

4 WORK PROGRAMME

Consideration was given to the Committee's work programme.

Members were advised that the LEP review was ongoing and the scope for greater use of briefing papers for some standing items was raised.

With regard to S106 and CIL, it was advised a report would be brought to the Committee as part of the local plan process. As the Authority was not currently a provider of social or affordable housing the issues under consideration would primarily fall within the remit of the Economic Growth, Environment and Development (O&S) Committee.

The Chairman noted that all Overview and Scrutiny Committees would also have a role in considering climate change.

5 LICHFIELD CITY CENTRE MASTERPLAN CONSULTATION

The Committee was advised that following publication of the draft Lichfield City Centre Masterplan a four week public consultation took place in January/February 2020 to establish the views and opinions of key stakeholders and the wider public.

Consideration was given to a report that summarised the representations received, the changes made as a consequence and the proposed actions going forward.

It was reported that the Car Parking Strategy and Public Realm had been identified as areas to be brought forward quickly. With regards to the consultation it was noted that over 1000 people had attended the consultation event at St Mary's.

In response to a question about commercial and revenue opportunities for the Council, it was advised that the Council had £45 million in terms of borrowing capacity, of which £35 million would be available if a current offer was accepted. In accordance with CIPFA guidance, borrowing could not be used purely for economic return, and would need to involve an element of place shaping or provide wider economic benefit. It would be for the Council to decide if it wished to invest in any of the four sites listed in the Masterplan with a view to helping deliver the plan and receiving a return/income for the Council.

The Chairman noted that a follow up meeting had been arranged for 22 April 2020.

RESOLVED: (1) That the consultation responses to the Lichfield City Centre Masterplan be noted.

(2) That subject to changes to the document resulting from the consultation, Cabinet be recommended to approve the document as a basis for the Council's ambitions for development within Lichfield City Centre.

6 LOCAL PLAN REVIEW UPDATE

It was reported that the consultation on the Local Plan Review Preferred Options had closed on 24 January 2020.

Representations had been received from approximately 460 individuals/ organisations with a further 685 individual members of the public submitting a standard response regarding proposals for Burntwood.

Whilst a range of supporting evidence had been completed, further evidence was still required to support the publication (regulation 19) version. The Local Plan evidence base that had so far been completed was being reviewed internally with additional 'critical friend' support provided externally by a barrister and planning consultancy.

The next version of the Local Plan would be the publication (regulation 19) version. At this formal stage, the document would be the Council's final position on the document with limited scope for further alteration.

It was proposed to amend the current Local Development Scheme (LDS) programme to change the publication version consultation date from May 2020 to July 2020. This would allow sufficient time for the processing of representations to be completed and for the further work to support the evidence base to inform the publication version of the Local Plan.

There was sufficient time within the LDS programme for the alteration to be made without amending the timing of the subsequent steps including the submission date of January 2021. Members were reminded that there was a commitment in the adopted Lichfield District Local Plan Allocations to submit a review of the Local Plan by no later than the end of December 2021.

In response to a question about representations it was advised that letters were acknowledged, key issues identified and a summary of representations produced.

The Committee noted that there was a target provision of 11,780 houses with a 20-25% buffer of additional sites since not all developments granted planning permission would be delivered.

It was confirmed that further planning permissions could not be denied if the number of houses built reached the target of 11,780, and all new dwellings in an area would count towards the designated number for that specific area.

The need for sufficient infrastructure was highlighted, including health provision and education. It was advised that the infrastructure delivery plan would be developed as part of the local plan, although the actual delivery of aspects of the infrastructure, e.g. doctors' practices, would be dependent on other bodies and organisations.

Resolved: (1) That the Committee notes the progress and next steps associated with the Local Plan Review.

(2) That the Committee recommends that Cabinet approves the revised Local Development Scheme timetable set out in the report.

7 BURNTWOOD DEVELOPMENT

The Cabinet Member for Investment, Economic Growth & Tourism gave a verbal update on activity in connection with Burntwood.

It was reported that the Burntwood Town Deal partnership comprising the District, Town and County Council had met three times since the local elections and was looking collectively at initiatives. Arising from these discussions:

- the District Council was supportive of a feasibility study for a Burntwood BID
- it was proposed that an exercise be undertaken to involve the local community
- consideration was being given to the 'blue hoardings' and 'Olaf Johnson' sites.

The Committee noted that the leader of the Town Council had forwarded a number of possible initiatives and discussions were also being held with the Town Council regarding the possible transfer of parks and open spaces.

The Committee was informed that a recent Cabinet Member Decision had authorised investment in two outdoor gyms in Burntwood parks. This commitment to helping people live healthy active lives was welcomed and it was requested that consideration be given to the geographic distribution of such facilities to ensure access for as many residents as possible. It was confirmed that the relevant Cabinet Members would be happy to look at further proposals.

8 HS2 UPDATE

The Committee was advised that the Prime Minister had made a statement in February confirming the Government's support for HS2 phases 1, 2A and 2B. In making his statement the Prime Minister was influenced by the findings of the Oakervee Review on whether and how to proceed with HS2.

The review had concluded that there was a strong business case for the project and it had a strategic role in rebalancing the economy. It also identified the need for investment across the wider transport network.

Phase 1 had gained Royal Assent and a notice to proceed was expected in April. Phase 2A was likely to be enacted by the end of the year. Phase 2B formed part of a wider discussion about integrated transport across the north and it was likely HS2 would be asked to undertake further integrated transport planning with ministers.

It was reported that a Minister for HS2 had been appointed to provide more oversight and accountability to Parliament.

The Committee noted that some enabling works were already underway in the District including at Cappers Lane, Lichfield and the Council would be accepting an offer from HS2 to brief Members. It was advised that as a local planning authority the Council would have a role to play in considering some details of design and appearance.

Members were informed that following funding regimes had been established:

- A community fund - targeted at the voluntary/community sector to add benefit to communities along the route that are demonstrably disrupted by the construction of HS2
- A business fund - targeted at interventions that will have a positive impact on local economies affected by the construction phase of HS2
- A woodland fund - to help create native woodland or restore plantations on ancient woodland sites near to the HS2 route

Concern was expressed that 500 staff would be based at Cappers Lane which would have implications for local traffic flows, especially when taken in conjunction with increased lorry movements and the new development at Streethay. It was suggested that this be raised at the briefing to be arranged with HS2.

In response to a question about the Handsacre junction it was confirmed this link would, according to current indications, remain part of the scheme.

The importance of community engagement was emphasised with reference to the community forums established for the Trent Valley TV4 scheme and the early stages of the HS2 project.

It was advised that a community liaison manger was in place and the establishment of a community forum would be a good issue to raise at the HS2 briefing. The County Council, as lead transport authority, could also be approached about reinstating the community forums that had worked well during the early stages of phase 1.

The Chairman said the environmental statement would be awaited with interest, especially in the light of the successful challenge against the third runway at Heathrow Airport.

(The Meeting closed at 7.00 pm)

CHAIRMAN

ECONOMIC GROWTH, ENVIRONMENT AND DEVELOPMENT (OVERVIEW AND SCRUTINY) COMMITTEE WORK PROGRAMME FOR 2020-21

Item	9 June 2020	7 Sept 2020	26 Jan 2021	18 Mar 2021	Details/Reasons	Officer	Member Lead
Policy Development							
Terms of Reference	✓				To note	Christine Lewis	
Lichfield City Centre Masterplan	✓				To consider the final draft Masterplan and suggested Delivery Strategy before recommendation to Cabinet and Council	Helen Bielby	Cllr Iain Eadie
Local Plan Updates	✓	✓	✓	✓	Reports on progress with the preparation of the Local Plan	Stephen Stray	Cllr Iain Eadie
Burntwood development		✓		✓	Updates when available	Craig Jordan	Cllr Iain Eadie

ECONOMIC GROWTH, ENVIRONMENT AND DEVELOPMENT (OVERVIEW AND SCRUTINY) COMMITTEE WORK PROGRAMME FOR 2020-21

Item	9 June 2020	7 Sept 2020	26 Jan 2021	18 Mar 2021	Details/Reasons	Officer	Member Lead
Briefing paper on Development Management performance		✓		✓	6 monthly reporting of planning performance	Claire Billings	Cllr Angela Lax
Outcome of LEP review	✓				Outcome of Government review into Local Enterprise Partnerships verbal update if necessary, report or briefing paper depending on outcome of review and implications for District when available	Craig Jordan	Cllr Iain Eadie
CIL, s106 and Affordable Housing		✓			Review (via Task Group) of how the council is using s106 to deliver affordable housing; how CIL is delivering infrastructure improvements and whether the council's CIL charging regime remains appropriate. This may be joint with CHH O&S	Stephen Stray	Cllr Iain Eadie
High Speed 2			✓		To receive a briefing paper(s) on issues relating to Phase 1 and 2a of HS2 as they impact on Lichfield district	Craig Jordan	Cllr Iain Eadie

ECONOMIC GROWTH, ENVIRONMENT AND DEVELOPMENT (OVERVIEW AND SCRUTINY) COMMITTEE WORK PROGRAMME FOR 2020-21

Item	9 June 2020	7 Sept 2020	26 Jan 2021	18 Mar 2021	Details/Reasons	Officer	Member Lead
Lichfield BID Second Term Renewal			✓		To consider Lichfield District Council's vote	Jonathan Percival	Cllr Iain Eadie
Economic Development Strategy 2020-2024		✓			To consider a draft ED Strategy including a response to the impacts of CV19 on the local economy and business	Jonathan Percival	Cllr Iain Eadie
Conservation - Local List			✓		To consider a report on the Council's Local List for important heritage assets	Claire Hines	Cllr Angela Lax
Conservation Area Appraisals and Management Plans				✓	To consider a report on progress with Conservation Area Appraisals and Management Plans – work programme and work undertaken	Claire Hines	Cllr Angela Lax
Car Parking matters		✓			To consider a report on car parking issues relevant to the plans for redevelopment in Lichfield City Centre and in response to CV19.	John Roobottom	Cllr Iain Eadie

Lichfield City Centre Masterplan

Report of the Cabinet Member for Investment, Economic Growth & Tourism
Councillor I. Eadie



Date: 9th June 2020

Contact Officer: Helen Bielby

Tel Number: 01543 308252

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Local Ward Members: All Members

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

1. Executive Summary

- 1.1 Following the report to this committee in March 2020, further work has been taking place on the City Centre Masterplan prepared by David Lock Associates. This work has now been completed and the document presented to the Council as the basis for future development within Lichfield City Centre. Following on from this, work has now commenced on moving the project forward to consider how the Masterplan and its component parts would be delivered assuming the Masterplan is in due course approved. This work will include the preparation of a Delivery Strategy and a set of specific actions together with details of governance arrangements and resource requirements.

2. Recommendations

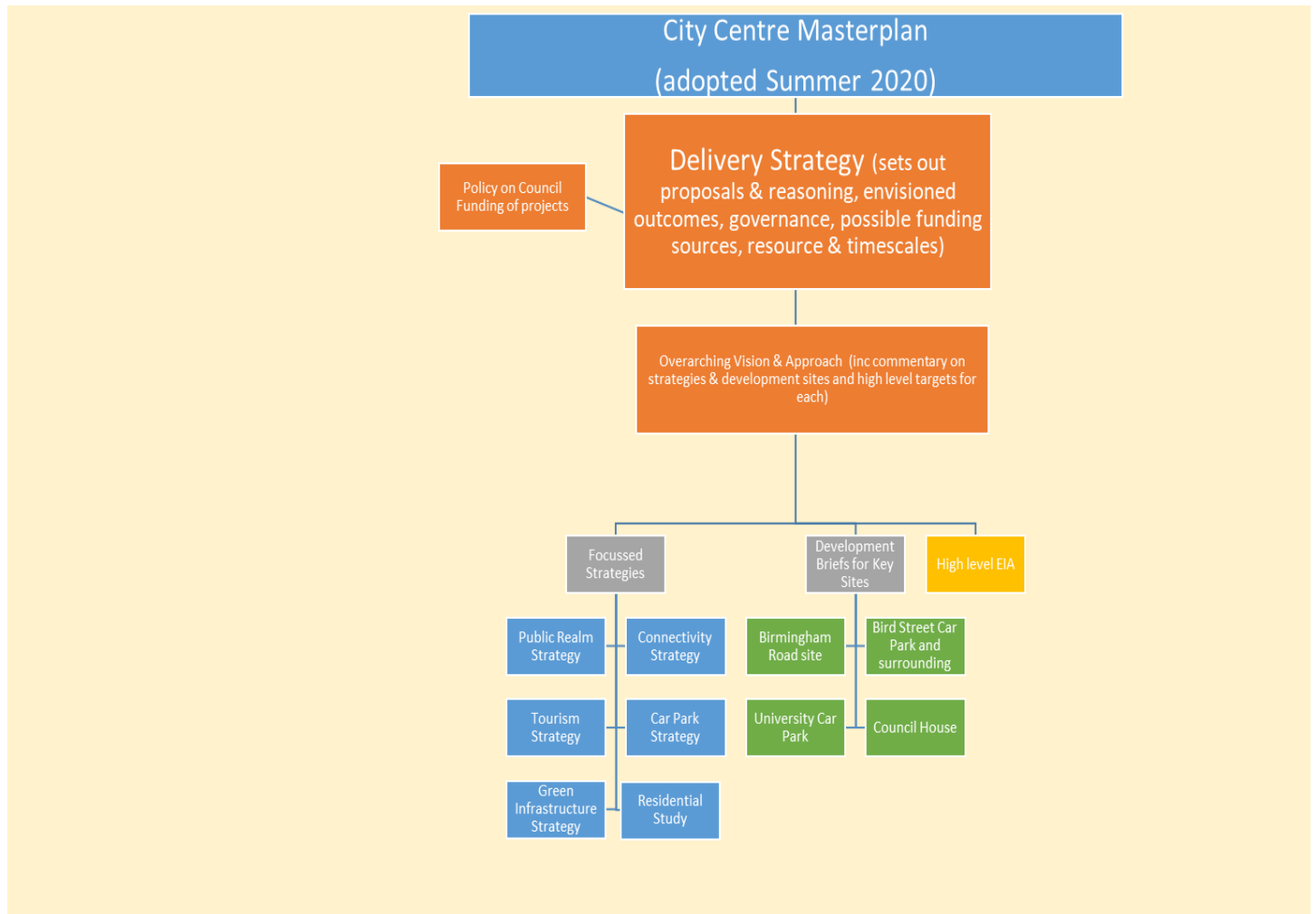
2.1 That the Committee:

- Endorses the City Centre Masterplan and recommends to Cabinet its adoption as the basis of shaping the future development of Lichfield City Centre
- Endorses the proposed approach of moving the proposals in the Masterplan forward, including bringing forward a Delivery Strategy.
- Endorses the proposal to bring forward a Public Realm Strategy as the first in a series of strategies to be produced and implemented
- Endorses the undertaking of a capacity study for Council owned car parks to inform a Car Parking Strategy
- Endorses the proposal to undertake preliminary work to inform work on a development brief for the Birmingham Road site

3. Background

- 3.1 Consultants David Lock Associates were commissioned in July 2019 to undertake work and formulate a Masterplan in respect of the future Lichfield City Centre. Following an Analysis, Issues and Options exercise, a draft Masterplan was duly prepared. Public consultation on the draft Lichfield City Centre Masterplan took place from the 6th January 2020 to 3rd February 2020.

- 3.2 As a result of the public consultation a number of changes were made and a final Masterplan was submitted to the Council in March 2020. This is attached at **Appendix A**. It is envisaged that the Masterplan, once approved by the Council, will be used as a base document, from which further plans/strategies for the finer detail regarding the development of the city centre will emerge.
- 3.3 Since its submission to the Council, work has been focussed on how the proposals within the Masterplan could be delivered once approved. The diagram below sets out the proposals for the work that will be undertaken from adoption through to the production of all strategies and development briefs.



- 3.4 Once approval is given to the Masterplan a Project Initiation Document (PID) will be produced. This will be the control document for the work programme moving forward and will allow a governance structure to be set up to focus specifically on the programme of tasks needed to implement the Masterplan proposals. The first document to be considered will be the Delivery Strategy and Overarching Vision & Approach. This will set out the Council's confirmation of the Masterplan proposals and give further consideration to the proposed individual development projects to confirm that they are each and collectively viable and deliverable. The document will set out the reasoning as to why the key areas of development within the city centre should come forward and the outcomes that are envisaged. It will also set out the agreed governance structures and resources required (including project teams and leads) as well as possible delivery routes and funding/investment sources. Proposed timescales for delivery will also be included.

- 3.5 The strategy document would be reviewed on a regular basis and updated as necessary. Whilst work on this document could only be finalised after the Council has formally agreed the overarching Masterplan, work has already commenced on defining a structure of its likely contents and also where possible populating with certain details which would be core to delivery.
- 3.6 It is important that the delivery strategy reflects the overarching aims and objectives of the master plan and that any development proposals that duly come forward are in line with the ethos set out in the masterplan. DLA in its work recognised that Lichfield city is an important location serving not only local residents but also visitors. It is of historical, cultural value and the city centre in particular showcases a number of significant assets including buildings and areas of public realm. These need to be preserved and safeguarded and used as the building blocks for new appropriate development that meets existing and future populations and those of visitors. These principles will therefore need to be captured in the strategy and help shape the delivery of all plans and proposals that subsequently emerge.
- 3.7 Linked to the above will be defining the key outputs and outcomes – the masterplan seeks to ensure that Lichfield city centre remains attractive and economically vibrant. To do this the District Council and partners will need to ensure that the city centre, the city as a whole and Lichfield District are seen as places to live, work, play and invest in. Any delivery strategy therefore should work in tandem and be aligned with other key strategies such as that relating to the Visitor Economy and activities that help maintain pleasant and accessible open spaces. The delivery strategy and proposals that come out of this will be expected to enhance the look and appearance of the city centre, respect existing built and natural environments but also and most importantly serve to meet the needs and demands of different sections of our community, the young, older people, families etc. It is vital for the future of the city centre and its residents that it remains relevant.
- 3.8 Having set out the purpose of the Strategy, its underlying principles and expected outcomes the focus will be on setting out specific work streams and tasks. These are currently proposed to include work on public realm, car parking, tourism, connectivity, green infrastructure and residential studies. Of these, it is proposed to bring forward the public realm strategy as the first strategy to be produced due to its interactions with all types of development within the city centre and to provide a basis for any upcoming work as a result of how the city centre may function moving forward. This would include exploring the potential for limiting vehicular access to the city centre and giving priority to pedestrian movement which potentially could unlock a number of new opportunities for how people and business access and use the city centre. A dialogue with Staffordshire County Council as Highway Authority would be required amongst others but this would inform a commission to be developed for later this year.
- 3.9 Alongside a public realm strategy another key priority piece of work would be that of considering parking requirements. A car parking strategy is planned which will require a capacity study of all existing city centre car parks. The intention will be to ensure that suitable parking provision to meet needs is put in place and that the impacts of CV19 and the changing nature of our high streets and consumer lifestyle choices are fully taken into account.
- 3.10 Timescales and resource requirements will be developed as the details of the proposed delivery strategy take shape. A draft work programme for 2020/21 is attached at **Appendix B**. As mentioned

earlier there will be key pieces of work that will need to start as soon as is possible after the Council confirms its acceptance of the master plan. As the strategies are produced these will assist in the formulation of development briefs for sites where detailed proposals are not already in hand. Here the focus to begin with will be taking forward the on-going feasibility work in respect of the District Council House (led by the Council's Property team and reporting into the Strategic Asset Management Committee). Exploratory work on the Birmingham Road site will commence this summer and where enabling works are currently taking place to facilitate longer term re-development plans. As regards resource requirements, the intention will be to utilise as much as is possible the various considerable skills and knowledge available within the Council across a number of relevant disciplines, complementing these with external specialists where these will be necessary. Examples of the latter include advice on commercial property matters, legal advice and funding streams.

- 3.11 The delivery strategy and its implementation will need to be effectively managed, reported on and results ultimately assessed. Here suitable governance arrangements will be required and work is presently underway to identify a structure involving officers and members with relevant inputs from external partners. The EGED Committee will be represented via nominated members in this structure and this will complement any additional on-going reporting that would be expected as part of the Committee's normal annual work programmes.
- 3.12 Although the budgets for the aforementioned work are still to be established it is noted that to deliver such an ambitious programme of will require revenue and significant capital funding. As stated above resources have been previously agreed to assist in delivering major development projects and these will be used alongside other resources within the Council. There will however be a need to bring in external assistance and therefore a revenue budget will need to be identified. As regards capital expenditure, the master plan work undertaken by DLA also considered the different ways implementation of the masterplan elements could be funded. These options will need greater more detailed scrutiny and relate to individual projects but one important issue for the Council will be the degree to which if any, the Council commits capital monies. Members are asked to consider what role Lichfield District Council should have in the place shaping of the city, given the approved borrowing provision of £45 million within the MTFS and whether they would wish to see the Council use this in conjunction with the capital strategy to implement the delivery of some or all of the Masterplan proposals.

Alternative Options	<ol style="list-style-type: none"> Members could request alternative proposals to the Delivery Strategy and associated documents as set out above in order to bring forward the implementation of the City Centre Masterplan Members could request other pieces of work are brought forward in advance of those set out.
Consultation	<ol style="list-style-type: none"> The draft Masterplan has been subject to public consultation as outlined in the main body of this report. Ongoing consultation and engagement with key stakeholders including local residents will take place as the Delivery Strategy is finalised and rolled out in its operation.
Financial Implications	<ol style="list-style-type: none"> The formulation of the proposed strategies and briefs and the implementation of projects will require revenue funding and potentially capital funding from the District Council. More detailed work to be carried out will determine the scale and nature of funding required however it should be noted that the Council has previously agreed to borrow to invest in delivering property. It should also be noted that potential funding from

	external partners will also be explored be it from the private or public sectors.
Contribution to the Delivery of the Strategic Plan	<ol style="list-style-type: none"> 1. The Masterplan, Delivery Strategy and the associated delivery documents will particularly help support and deliver the Council's strategic objectives of developing prosperity and shaping places to benefit residents and business. 2. The formulation of the strategy's and implementation of projects will also assist in enabling residents and those who access services and facilities within Lichfield city centre to live healthy and active lives.
Equality, Diversity and Human Rights Implications	<ol style="list-style-type: none"> 1. None
Crime & Safety Issues	<ol style="list-style-type: none"> 1. None
Environmental Impact	<ol style="list-style-type: none"> 1. None directly from this decision, although some of the strategies and projects will be able to contribute to the Council's ambitions regarding sustainable development
GDPR/Privacy Impact Assessment	<ol style="list-style-type: none"> 1. Not applicable

	Risk Description	How We Manage It	Severity of Risk (RYG)
A	The draft masterplan is not recommended by the Committee to be adopted by the Council	Members have played an active part in the formulation of the document and have had the opportunity to provide consultation responses to the draft plan.	Yellow
B	Some of the proposals contained within the masterplan and delivery strategy may not be welcomed by all stakeholders	The public consultation has demonstrated considerable support for the proposals included in the masterplan. Further public consultation may take place on specific development opportunities prior to statutory consultation via planning applications etc	Yellow
C	There will be significant capital required to deliver the proposals for both the strategies and projects.	A budget will be drawn up and reported on regularly. Options for funding from other public bodies will be researched. Funding options for development projects will be further considered	Yellow
D	Officer resource may not be available and delivery of the projects may be delayed	Recruitment is taking place for a further team member within the Major Development Projects team. Further resource requirements will be identified in due course.	Yellow
E	The impact of Covid-19 on centres is not yet ascertained. Economic instability will have an impact on investment funding of major projects.	Commercial property markets will be monitored and professional advice will be taken as necessary. Budgets will be monitored and work programmes will	Red

Local government funding may also decrease and the ability to bring forward development projects may be severely hampered	be adjusted to cater for the economic impact that the epidemic will have	
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Background documents
[Appendix A - City Centre Masterplan \(DLA Associates\) Final Report \(March 2020\)](#)
[Appendix B – Proposed work programme 20/21](#)

Relevant web links



LICHFIELD

CITY CENTRE MASTERPLAN

MASTERPLAN REPORT

Prepared for Lichfield District Council
Produced by David Lock Associates
In collaboration with Integrated Transport Planning & Springboard

March 2020







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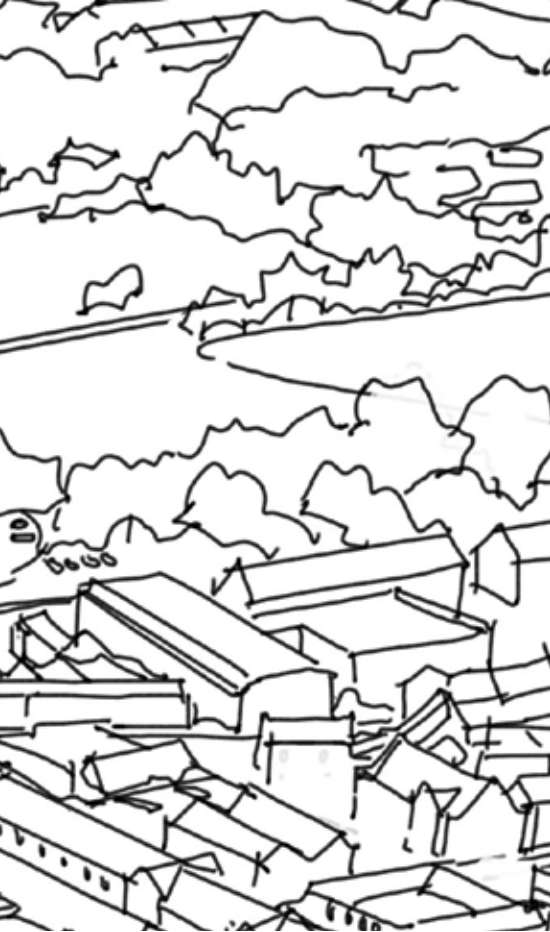
01

INTRODUCTION

What is the Lichfield City Centre Masterplan?

- 1.1 Lichfield District Council has appointed a team of town planning and urban design specialists, led by David Lock Associates (DLA), to produce a new masterplan for Lichfield city centre. The DLA team are supported by Springboard (city centre characterisation specialists) and Integrated Transport Planning (ITP).
- 1.2 The masterplan will be an important document that will shape the future growth of the city centre, set out opportunities for enhancing the quality of the city centre environment and the range of different uses it offers, and provide a prospectus for investment in Lichfield. The District Council consider the masterplan to be a key means of enhancing what is already a strong and vibrant city centre, and its preparation underscores the importance of the city centre as an asset for residents of Lichfield, visitors to the city, and those who work in Lichfield.
- 1.3 The masterplan is being prepared in order to add detail to and help implement policies set out within the emerging Local Plan, the aspirations contained within the Lichfield City Centre Development Strategy and Action Plan and the objectives of the Lichfield City Neighbourhood Plan. The masterplan is supported by a Delivery Strategy, to help ensure that proposals in the masterplan are both achievable and deliverable. The masterplan will be considered as part of the Local Plan review process and any future Development Briefs for specific sites.





- 1.4 The District Councils' aspirations are to build upon the City of Lichfield's existing offer as a key location within the District and a focus for investment and growth:

Lichfield City Centre will be promoted as a strategic centre by improving its range of shopping, leisure, business, cultural, education and tourist facilities whilst sustaining and enhancing the significance of its historic environment and heritage assets and their setting.

Preferred policy: Lichfield economy, Local Plan Review – Preferred Options and Policy Directions, 2019



- 1.5 As well as supporting emerging planning policy, the projects set out in the masterplan will also be used to shape the future of the city centre by encouraging appropriate land uses and public realm improvements (the streets, public spaces and everything contained within those spaces) to ensure Lichfield continues to prosper in a sustainable way which is sensitive to the city's character. The city centre will continue to be a vibrant place that people enjoy for a variety of reasons, as a home, a place to relax and shop, for recreation or to work.
- 1.6 The masterplan is part of the wider work by local public services and partners to manage growth in Lichfield to improve and support the economy, encourage more jobs, enable housing development, create opportunities and support the well-being of communities. As such the masterplan draws together a range of related and complementary initiatives covering economic development, community activities, leisure and well-being, access and movement, accommodating growth and preserving and enhancing the historic and cultural environment of the city.
- 1.7 With this in mind, the masterplan is a flexible framework rather than a rigid blueprint, setting out clear aspirations that the District Council would like to achieve while being able to accommodate potential future need. This will be subject to the work of all partners as well as the availability of funding. It is an enabling document, providing opportunities for beneficial investment and change, but mindful of protecting those qualities that make Lichfield special, particularly its historic environment.





Preparation of the Masterplan

1.8 The masterplan has being prepared in three main stages:

STAGE ONE: BASELINE REVIEW AND ANALYSIS

1.9 The first stage was analysis and review of all existing information about the city centre. This stage of the masterplan built on work already undertaken by the District Council, including issues identified through previous stakeholder and community engagement exercises, particularly those which focussed on the Birmingham Road site in Spring 2019.

1.10 The evidence base has been supplemented by a number of initial one-to-one conversations with key officers, local elected members, members of the project group and key stakeholders. The 'Analysis, Issues and Options Report' is the culmination of the stage one work. The report has been published in advance of the draft masterplan and is available to view on the District Council's website.

STAGE TWO: DRAFT MASTERPLAN

1.11 The second stage was the preparation of a draft masterplan, which has been informed by the issues and options identified in stage one. Six key objectives were developed from the issues and options identified. These objectives have shaped the development of the masterplan. Development opportunities and public realm priorities have also been identified to help meet these six objectives.

1.12 The masterplan is aspirational whilst continuing to support and facilitate the vitality and characteristics of the city centre that make it attractive and popular. The masterplan is also practical and, importantly, deliverable. The masterplan identifies short, medium- and longer-term opportunities, to ensure it is also achievable and deliverable within the 2040 timescale of the Local Plan.

1.13 The Draft Masterplan report was subject to a four-week period of consultation and engagement with residents of, businesses and services in, and visitors to the city, as well as other stakeholders.

STAGE THREE: FINAL MASTERPLAN

1.14 The third and final stage involved revisions to the masterplan, based on the outcomes of the consultation. The final masterplan will be published by the Council, to help guide future development within the city centre.



02

MASTERPLAN CONTEXT & ANALYSIS

Understanding Lichfield - Key Themes

- 2.1 The historic city of Lichfield is located in Staffordshire, around 18 miles to the north of Birmingham. Lichfield is well connected to the local and strategic highway network, and is served by two railway stations, Lichfield City and Lichfield Trent Valley. Lichfield District has a population of a little over 100,600 of which 32,000 live in the city. The city has a strong history with the city skyline dominated by the cathedral which is the only three spired medieval cathedral in England. The city's market was first chartered in 1153, and the market square is another historic focus in the city centre.
- 2.2 In order to fully appreciate the rich and varied context of Lichfield, and to provide a robust evidence base from which to inform the city centre masterplan, a comprehensive baseline review and analysis has been undertaken by the project team. The review and analysis focused on three main areas:
- Background documents comprising existing studies, appraisals, policies and plans (the 'evidence base' for the city centre) including physical character and function on its strengths, opportunities and historic growth;
 - The property market in Lichfield and its place 'characterisation' and 'footfall signature' to understand the city's primary role and function; and
 - Access and movement around the city centre.
- 2.3 From the review and analysis, a number of key themes have been identified, which are summarised below. In addition, information on the city's signature, and accessibility are also summarised on the following pages.



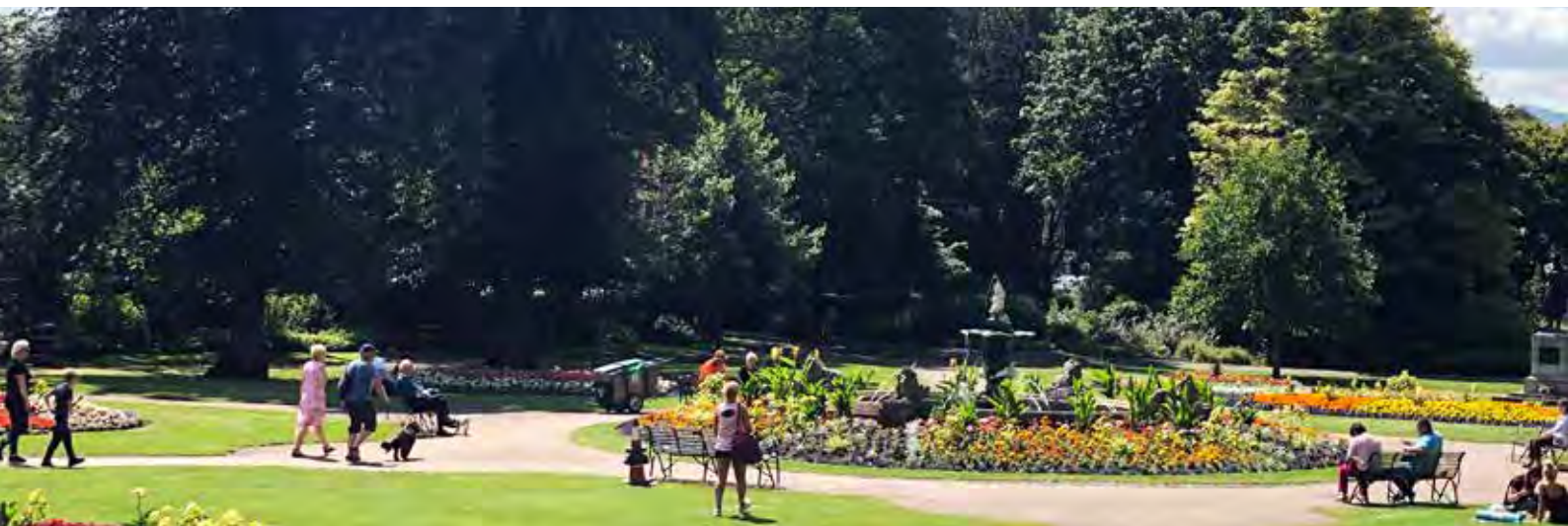
Preserve & enhance the historic environment

- 2.4 Lichfield is a historic cathedral city with a significant number of heritage assets (including the Grade I Listed cathedral) located within the Lichfield City Conservation Area. The historic character and quality of the centre is a key attractor for visitors.
- 2.5 It is important that any new development is sympathetic to the historic character of the city. It is also important to ensure that views of important historic buildings, including the spires of the cathedral, St Mary's church and St Michael's church are retained across the city centre, and consideration given to where new vistas could be introduced.



Support & provide a vibrant mix of uses in the city centre

- 2.6 The combination of residential, commercial, cultural, visitor and religious uses ensures that Lichfield has a vibrant and prosperous city centre with a special character. Whilst Lichfield does not contain many of the national retail chains and stores typical of larger towns and city centres, niche and artisan retail are a key component of Lichfield's character. This means Lichfield has a unique retail offer to attract visitors.
- 2.7 Lichfield city centre benefits from an existing night-time economy, particularly at weekends. New development should seek to complement, not compete with, the existing offer. Where new retail is introduced, the focus should be on niche, independent retailers, as part of a wider mix.
- 2.8 Nationally, most high streets and city centres are shifting towards a more experience-led offer. Leisure uses and restaurants are key considerations and the evidence review suggests a need to cater for a younger demographic. Improving the leisure offer, could increase dwell time and attract visitors from a wider catchment area.
- 2.9 At the time of writing, Lichfield District Council has resolved to provide investment towards the provision of a new leisure facility in Lichfield and to undertake repairs and maintenance to keep the Friary Grange Leisure Centre open in the short to medium term. A site for a new facility in Lichfield needs to be identified by the Council. This has been considered in developing the Lichfield City Centre Masterplan and some commercial leisure uses do form part of the overall development mix at on the Birmingham Road Gateway site. Such uses, combined with retail, residential, business and hotel uses have a much greater potential to generate value on the site ensuring that proposals are commercially viable and capable of delivery. Deliverability is a key consideration for the draft City Centre Masterplan. Leisure Centres are typically bulky buildings which often provide blank frontages to the surrounding public streets and spaces and require a large amount of car parking. This would provide a poor entrance to the southern gateway of Lichfield. Alternative, suitable sites are being considered by the Council beyond the city centre of Lichfield.



Enhance the tourism economy



- 2.10 The city centre is well positioned to meet the leisure and cultural needs of Lichfield and the wider sub-region, through its existing range of leisure and cultural venues, including the Garrick Theatre, the Samuel Johnson Birthplace Museum, Erasmus Darwin House and the cathedral.
- 2.11 Festivals, concerts and the light illuminations over the festive period are extremely popular, but the city centre has the capacity to accommodate more events and visitors. The provision of a multi-purpose community venue to host a programme of cultural/arts events could also cater for a variety of different uses, including by existing local groups and commercial businesses. In addition, hotel and other types of visitor accommodation would encourage longer stays.
- 2.12 Existing facilities, such as public toilets, are not considered adequate to serve the city's population and its visitors. There are too few facilities, and the existing are often unpleasant. Public facilities should be clean, attractive and convenient to use to enhance the visitor's overall experience and to encourage repeat visits.
- 2.13 Lichfield city centre has a strong tourism-based economy. However, parts of the city centre can feel disjointed due to poor legibility and signage, particularly between Lichfield City Train Station and the cathedral. The gateway into the city is unattractive, and visitors may miss out on some of the city's attractions, due to difficulties in navigating their way around the city centre.
- 2.14 For a cathedral city with such a range of attractions, Lichfield is not as widely known as a visitor destination as it might be. There should be a drive towards raising the profile of Lichfield as a destination, highlighting what the city has to offer to encourage a greater number of visitors. This could be linked with other major attractors in the nearby area, such as Drayton Manor Theme Park and the National Memorial Arboretum, to encourage visitors to spend longer periods of time in Lichfield.

Support commercial activity



- 2.15 Job creation in the city centre promotes local employment and helps to reduce the level of out commuting to neighbouring towns and cities. There is an increasing demand for flexible, small scale offices in Lichfield to support SMEs and start-up businesses. Providing for such office floorspace could work towards attracting and retaining a younger demographic to the city centre and in enhancing links to South Staffordshire College.

Maintain a public realm and open spaces of the highest quality

- 2.16 Lichfield city centre has a variety of public spaces, including Market Place, Beacon Park, Minster Pool and Stowe Pool which are valued by the existing community and by visitors. These important spaces should be maintained and enhanced. There is the potential to extend the provision of landscape planting and public spaces within the heart of the city centre, to encourage dwell time.

Characterising Lichfield – City Signature

2.17 It is important to understand Lichfield's role and function as a centre to be able to identify appropriate uses which will support and complement its growth in a sustainable way, over the coming years. For Lichfield to maximise its potential and future-proof itself, it is critical that it adopts strategies that are appropriate for its "signature" (as set out more fully in the 'Analysis, Issues and Options Report').

2.18 An analysis has been undertaken by Springboard of Lichfield's pattern of usage in terms of pedestrian footfall. Historically, town and city classifications have been based on supply side factors only, e.g. the number of retail units. However, the significant shifts in consumer demand that have occurred between online and bricks and mortar has resulted in significant changes in town and city centre occupancy, rendering these historic classifications out of date. Analysing a city in terms of its usage is more relevant in today's multi-channel trading landscape (i.e. town and city centres today are no longer simply about retail).

2.19 Lichfield has a **Speciality** signature. One of the key characteristics of Speciality towns and cities is that footfall is as high or higher in the peak summer months than in December. This pattern of footfall is a consequence of the key characteristics of speciality towns and cities which comprise:

- An Anchor which is not retail, e.g. heritage
- Attracting visitors but serve local population
- Having longer dwell time
- Focus is on protecting identity and positioning
- Offering something unique and special

2.20 Lichfield is the only city in its subregion (as illustrated in Figure 1) that is defined as a Speciality town/city. This offers Lichfield an opportunity to differentiate itself from other towns and cities, and to deliver a unique offer that capitalises on its Speciality signature type.

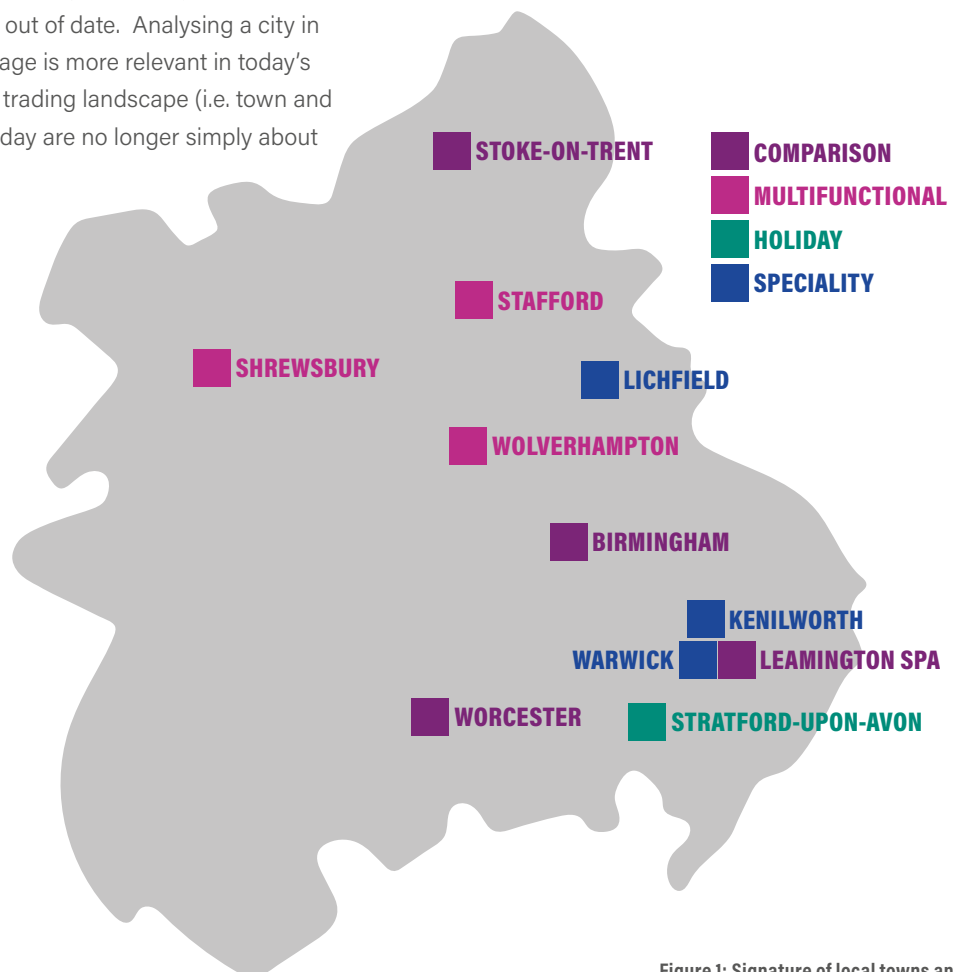


Figure 1: Signature of local towns and cities

Getting around Lichfield – Access & Movement

TRAVELLING TO & FROM LICHFIELD

- 2.21 Lichfield strongly benefits from being well-connected to Birmingham, London and the rest of the UK by rail and road. This serves the city centre by encouraging tourists to visit, and workers to commute inwards and outwards. It is important to consider the quality of these key gateways, particularly ensuring that they are safe, attractive and convenient to use.
- 2.22 Congestion on Birmingham Road and St John Street needs to be addressed and the proposed Lichfield Southern Bypass aims to alleviate some of this congestion by removing through trips from the city centre. Congestion impacts the experience of car, bus and coach movements through the city, but also the safety of pedestrians and cyclists alighting from Lichfield City Train Station.
- 2.23 The city centre is well served by a variety of car parks but suffers from a perception that there is a scarcity of parking spaces. In fact, information on car park availability and usage across the city centre suggests that overall capacity is good for a city the size of Lichfield, but that the most popular locations such as Bird Street operate over capacity.
- 2.24 Given that Lichfield has a compact and walkable city centre it will be important to better distribute usage across the various parking facilities and thus reducing the perception of parking scarcity. Real time information signage to existing car parks would direct visitors to car parks with available capacity, to help ensure that all locations are suitably utilised. Improvements to coach drop-off and parking locations are required to promote increased group travel. In addition, improving signage and wayfinding around the city centre will help people navigate their way around, reinforcing the compact character of the city centre and giving people confidence to explore further whilst at the same time promoting active and sustainable modes of travel.

- 2.25 Sustainable transport is a key consideration, shaping how infrastructure improvements can be used to encourage more sustainable means of travel, be it walking, cycling or the use of public transport. Provision of Electric Vehicle Charging points could also provide an additional option, to help promote the up-take of more sustainable modes of travel.

MOVING AROUND THE CITY CENTRE

- 2.26 Lichfield benefits from being compact in form, with Lichfield City Train Station providing access to Lichfield cathedral and the historic city core within a 10 minutes' walk. Improved pedestrian and cycle routes and cycle parking facilities are required, including along Birmingham Road, to help to encourage people to walk and cycle and utilise public transport services, rather than rely on the private car.
- 2.27 There is the opportunity to review existing pedestrianised areas within the city to provide greater clarity on those areas which are pedestrianised and those which are not. Pedestrianised areas within the city centre need to be carefully considered to balance the needs of those requiring access to blue badge parking spaces and also allowing for access to servicing areas.
- 2.28 The city centre is widely recognised as being poorly signposted, with little to no means for visitors to easily identify the best route to reach the city's key attractions. In seeking to promote the city as a tourist destination, it will become increasingly important to provide clear, legible signage and wayfinding across the city centre.

What does the Masterplan Propose?

2.29 The masterplan is structured around the following four core proposals. These proposals have regard to the analysis undertaken and the issues that need to be addressed to maintain the city centre as a vibrant, successful and valued place.

1. MASTERPLAN OBJECTIVES

Six masterplan objectives have been identified.

The aim of the objectives is twofold: firstly, to help capture and address identified issues in the city centre; and secondly to help underpin projects and proposals set out in the masterplan and how they contribute towards addressing identified issues.

2. MASTERPLAN QUARTERS

In order to better understand the city centre, and provide a means of focusing investment, the masterplan identifies four overlapping city Quarters. These are based on patterns of existing activity and movement, the historic environment, and on places where investment should be targeted. They are interconnected by key movement routes and streets across and around the city centre.

3. MASTERPLAN OPPORTUNITY AREAS & PUBLIC REALM PRIORITIES

The masterplan proposes a number of projects and proposals which includes new developments, new streets and spaces, and enhancements to existing places in the city centre. The projects and proposals help reinforce the character of the city Quarters, diversify the range of uses and activities available in the city centre, and making it easier to arrive in the city centre and then move around it.

4. MASTERPLAN DESIGN PRINCIPLES

The masterplan design principles have been devised to help ensure that development coming forward in the city centre achieves high levels of quality commensurate with its outstanding historic character. The design principles should be read in conjunction with other local and national design policies.

Development that does not contribute to the character of the city centre, or enhances its vitality and viability, will not be supported by the District Council.

2.30 Further information on each of the masterplan core proposals is provided on the following pages.

Masterplan Objectives



OBJECTIVE 1: A STRONG HISTORIC CORE

- 2.31 Lichfield is a well-preserved historic cathedral city. This rich and varied historic environment is the defining characteristic of the city centre and is the primary draw for visitors to Lichfield. The masterplan aims to ensure that the historic fabric and environment of the city centre is valued, protected and enhanced. The majority of the city centre lies within the Lichfield City Conservation Area, which contains a high concentration of heritage assets. The medieval 'ladder' street pattern is evident in the central core of Lichfield.
- 2.32 The masterplan aims to ensure that development proposals not only conserve but enhance existing heritage assets and their wider setting. Conservation is an active process of maintenance and managing change, utilising a flexible approach. This will include the retention of existing views towards the spires of the cathedral and the potential to introduce new vistas.
- 2.33 Development within the city centre provides a unique opportunity to make a positive contribution to Lichfield's unique character and distinctiveness. A strong and successful centre helps support the rest of the city and provides many people with a positive key impression of Lichfield as a place.



OBJECTIVE 2: COMPLEMENTARY & SUPPORTING USES

- 2.34 Lichfield is characterised as a "Speciality" city. For Lichfield to maximise its potential and future-proof itself, it is necessary that the development opportunities identified in the masterplan are appropriate for its speciality signature.
- 2.35 Lichfield should seek to attract demand for new complementary uses to strengthen the existing vibrant mix of city centre uses. Niche independent retailers and the restaurant offer is what makes Lichfield unique and the masterplan aims to continue to support this offer. The masterplan proposes to emphasise a 'circuit of destinations' within the city centre including cultural, leisure, tourism and retail places, which themselves form distinct locations and will encourage longer visitor stays.
- 2.36 The masterplan identifies opportunities to provide for new housing to provide greater housing diversity (including affordable housing) in the city centre and to ensure that it is populated at all times of the day and into the evening.



OBJECTIVE 3: WELCOMING GATEWAYS

- 2.37 The experience of arriving in Lichfield is crucial in helping to shape people's perception of the city centre. The masterplan aims to ensure that the transition from being a passenger to a pedestrian is efficient, safe and welcoming.
- 2.38 Parts of the city centre can feel disjointed due to poor legibility and signage, particularly between Lichfield City Train Station, Lichfield Bus Station and the Cathedral. In seeking to promote the city as a tourist destination, it will become increasingly important to provide clear, legible signage and wayfinding across the city centre.
- 2.39 The masterplan aims to make the city centre easy to understand, through public realm improvements such as consistent signage so that visitors can easily identify the best route to reach the city's key attractions. The masterplan will encourage key sites to accommodate clear routes, to help direct pedestrians and cyclists around the city.
- 2.40 The masterplan proposes new land uses, enhanced streets and spaces and better connectivity, particularly for sustainable modes of transport, providing opportunities to significantly improve the first impression of the city. Enhancements to bus facilities as part of a wider transport hub, to include Lichfield City Train Station will be achieved through targeted development opportunities and public realm interventions identified within the masterplan.



OBJECTIVE 4: VIBRANT STREETS & SPACES

- 2.41 The public realm comprises the streets, footpaths, squares, green spaces, parks and other external urban spaces that are publicly accessible. The quality of the public realm should be such that they feel safe and pleasant to use by all types of users, including children, older people and those with mobility issues. Public realm improvements are identified in the masterplan which will help to enhance the quality and character of the public realm, equalling the high standards already set in places in the city centre.
- 2.42 Lichfield city centre has a variety of public spaces including Market Place, Beacon Park, Minster Pool and Stowe Pool which are valued by the existing community and by visitors. The masterplan aims to protect these important spaces and to extend the provision of landscaping and civic spaces within the heart of the city centre, to encourage dwell time.
- 2.43 The streets and spaces of the city centre are as much about the character and appearance of Lichfield as they are about access and movement. The masterplan continues to support a mix of different uses, set within streets and spaces which offer a safe, exciting and attractive place to spend time in.
- 2.44 The masterplan aims to ensure that the basic structure of the city centre is effective, establishing development parcels capable of delivering a strong pattern of land uses and activities. The mix of uses are supported through improvements to transport and movement in and around the city centre.
- 2.45 By identifying different sites that can accommodate a range of different land uses, new housing, business and employment, as well as tourism and leisure opportunities, the masterplan helps support the economic prosperity of Lichfield. In this way it will contribute towards making the city centre a more vibrant and attractive place and destination.



OBJECTIVE 5: QUALITY ACCESSIBLE ENVIRONMENT

- 2.46 The design, quality and appearance of the public realm is an important component in defining the character of a place, in shaping people's perceptions of place and in linking together key destinations and attractions within a city centre. The masterplan identifies public realm improvements to enhance connectivity between the Birmingham Road Gateway and the city centre, both visually and physically. These improvements must be sensitive to existing residents with regard to noise and light pollution.
- 2.47 As a compact city centre, the masterplan aims to improve pedestrian and cycle routes and wayfinding to help encourage people to walk and cycle and utilise public transport services, rather than rely on the private car, which in turn would ease car traffic congestion. This will contribute towards providing opportunities for improving health and wellbeing, through making it easier and more attractive to walk or cycle. Facilities to encourage more cycling – wayfinding, parking and storage – are also addressed as part of the masterplan.
- 2.48 The masterplan aims to improve safety for pedestrian users by providing clarity with respect to areas of the city centre with pedestrian-priority and those parts where streets accommodate both pedestrian and vehicle movements. This will need to be balanced with the needs of those requiring access to blue badge parking spaces and to servicing areas, to ensure the city centre functions on a practical level.



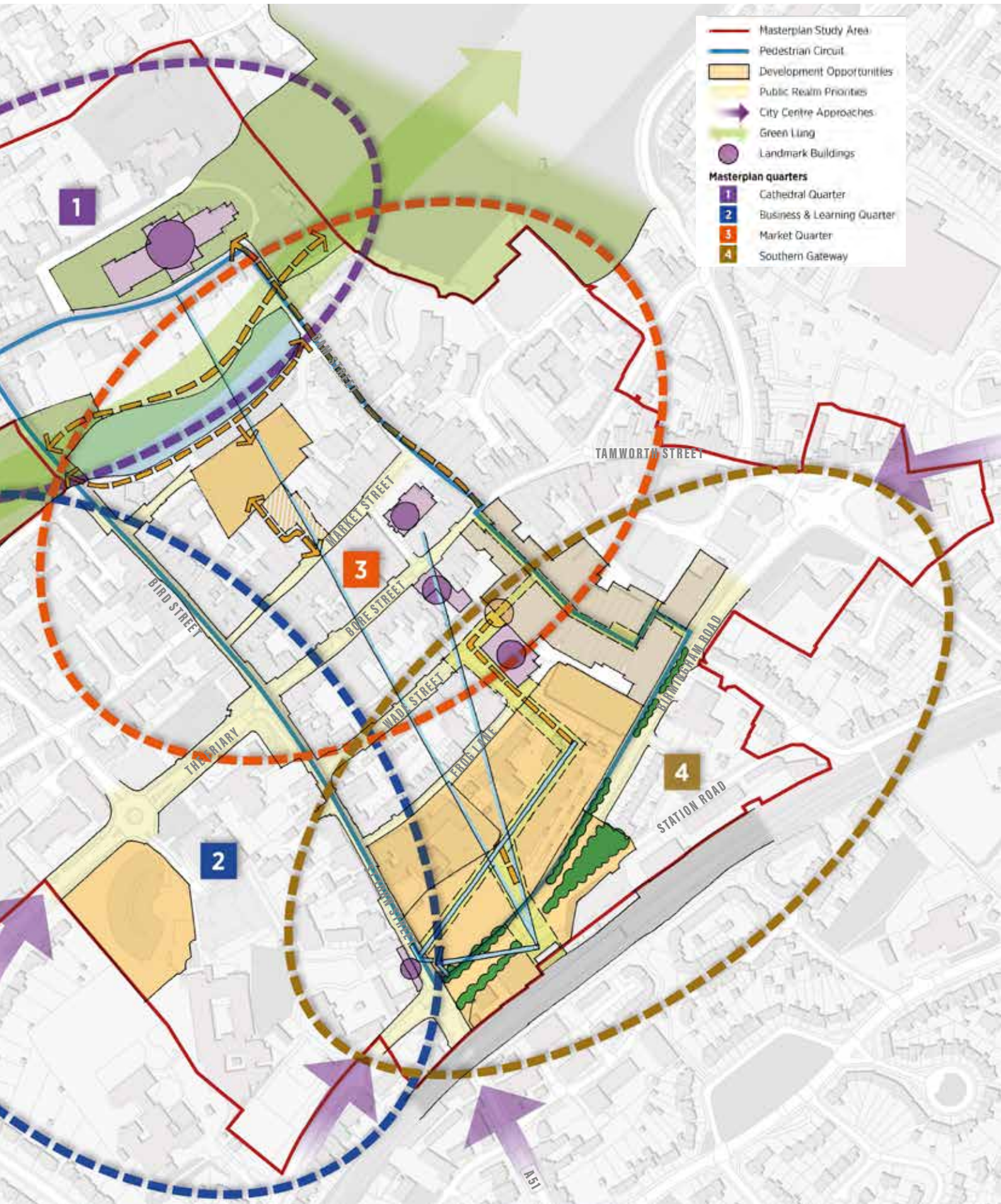
OBJECTIVE 6: THE 'GREEN' & SUSTAINABLE CITY

- 2.49 Green infrastructure (which includes open spaces, water bodies and landscape planting) provides many benefits, including:
- Improving people's physical and mental health;
 - Reducing air pollution;
 - Protecting against climate change to help reduce flood risk i.e. by utilising sustainable drainage measures (Sustainable urban Drainage Systems; SuDS) to manage storm water;
 - Providing comfort in urban environments – for instance trees provide shade and cooling;
 - Encouraging active travel i.e. using a form of travel such as walking, cycling and accessing public transport which involves physical activity; and
 - Providing opportunities for people to enjoy their leisure time.
- 2.50 The setting of the city centre is greatly enhanced through the presence of Beacon Park, Minster and Stowe Pools and landscaping. The masterplan aims to maintain, enhance and extend, where possible, the network of open spaces and landscaping within the city centre to provide benefits to residents, workers and visitors and increase biodiversity net gain.
- 2.51 The masterplan encourages the use of exemplary landscaping and the provision of open space and planting of native vegetation, together with SuDS including innovating paving treatments (e.g. permeable paving). As well as providing a drainage function, SuDS also contribute to amenity and enhance habitat creation and wildlife.
- 2.52 Specific building design features and construction measures can be incorporated to reduce energy demand. This includes both passive measures such as providing passive shading and south-facing windows, as well as active measures such as highly efficient boilers or high efficiency lighting. New development will be required to meet the mandatory requirements of sustainable development set out in Building Regulations (or equivalent future standard).
- 2.53 The masterplan aims to encourage the use of sustainable forms of travel, by improving connectivity to bus and rail links and enhancing pedestrian connectivity throughout the city centre.

Masterplan Quarters – Ensuring a Comprehensive Approach

- 2.54 The masterplan proposes a comprehensive and coordinated approach to maximise the potential of the city centre. This will facilitate the delivery of new development and public realm improvements which are designed to complement and connect with one another.
- 2.55 This approach enables growth to be planned in a sustainable way. This is particularly the case when considering city-wide strategies and improvements, such as public transport facilities, highway improvements and car parking provision. In so doing, the masterplan will give certainty to the development industry over what is expected within the city centre, helping to deliver the aspirations for Lichfield articulated through local policy.
- 2.56 In order to achieve a comprehensive approach, the masterplan has identified four distinct but overlapping city Quarters. The four city Quarters comprise the Cathedral Quarter, Market Quarter, Business and Learning Quarter, and the Southern Gateway Quarter.
- 2.57 The Quarters are defined, in part, by the established character of different parts of the city centre, its historic development, and by the prevailing mix of uses present. They provide a means of targeting investment ensuring that development opportunities and public realm priorities contribute to helping further enhance the character of each quarter but also the attractiveness and appeal of the wider city centre.
- 2.58 The Quarters are connected by key streets and spaces across the city centre. As well as performing a practical access function the streets and spaces also lend distinction to different locations in the city centre, helping people to find their way around Lichfield. They include the city's important green parks and spaces which are such an important part of the identity of Lichfield, specifically the Minster Pool, Stowe Pool, and Beacon Park. Together the Quarters, streets and spaces help define the city centre, are deeply embedded in its history and identity, and provide a robust framework for making decisions about its future.





- Masterplan Study Area
 - Pedestrian Circuit
 - Development Opportunities
 - Public Realm Priorities
 - ➔ City Centre Approaches
 - Green Ling
 - Landmark Buildings
- Masterplan quarters**
- 1 Cathedral Quarter
 - 2 Business & Learning Quarter
 - 3 Market Quarter
 - 4 Southern Gateway



CATHEDRAL QUARTER

- 2.59 This Character Area is focused on the area around the Cathedral, which also includes Lichfield Cathedral School, Erasmus Darwin House and residential dwellings located on The Close. This Character Area contains a rich mix of historic assets, most notably the Grade I listed cathedral.
- 2.60 An attractive backdrop is afforded to this area by the green 'lung' of Minster Pool, Beacon Park and Stowe Pool, which connects the cathedral with the Market Quarter. This setting is fitting of the cathedral's prominence and heritage status and its visibility provides an iconic landmark across the city.
- 2.61 The cathedral area should be maintained and protected whilst allowing for environmental enhancements including enhanced pedestrian routes and directional signage to further strengthen its important role within the city.

MARKET QUARTER

- 2.62 Representing a significant part of the city centre in terms of its role and function, the Market Quarter is used by a range of visitors, businesses and residents. The Market Quarter encompasses Bird Street, Market Street, Conduit Street and Bore Street.
- 2.63 This Quarter contains a mix of retail, commercial, café and restaurant uses as well as the Market Place which greatly contribute to the city's vibrancy. The niche and artisan shops, restaurants and cafés provide a unique offer to attract visitors and this should be maintained and strengthened with complementary new uses.
- 2.64 Within the heart of the city there are many important buildings including the Guildhall (Grade II) and St Mary's Church (Grade II*) which contribute to its' special historic character. The medieval 'ladder' street pattern is evident in this central core, providing important pedestrian routes. Any new development should seek to respond to the setting and built form character of the city.
- 2.65 There is an opportunity to improve the environmental quality and attractiveness of streets and spaces within the Market quarter, including through a consistently high quality of street furniture and paving. Interventions should also be made to enhance pedestrian comfort and safety by redressing the balance between the car and pedestrian.





BUSINESS & LEARNING QUARTER

- 2.66 The business and learning functions are focussed to the south-western part of the city. This encompasses South Staffordshire College/ Staffordshire University, Queen's Croft High School and the Police Mutual Offices, which is a major employer in the city.
- 2.67 There are existing linkages with the College/ University and Lichfield, due to their proximity to the central core of Lichfield. There is the potential to develop these linkages, to accommodate students, graduates and relevant businesses from the University and College.
- 2.68 Whilst this area predominantly focuses on business and learning, parts of this Quarter are also residential in character, with recent high-quality housing schemes at Chapter House on Monks Close and St John's Almshouses on the Birmingham Road.
- 2.69 The business and learning uses within this Quarter should be maintained, and opportunities pursued to rationalise the area of car parking at University West Car Park to make more efficient use of this land for new uses, alongside the car parking area.

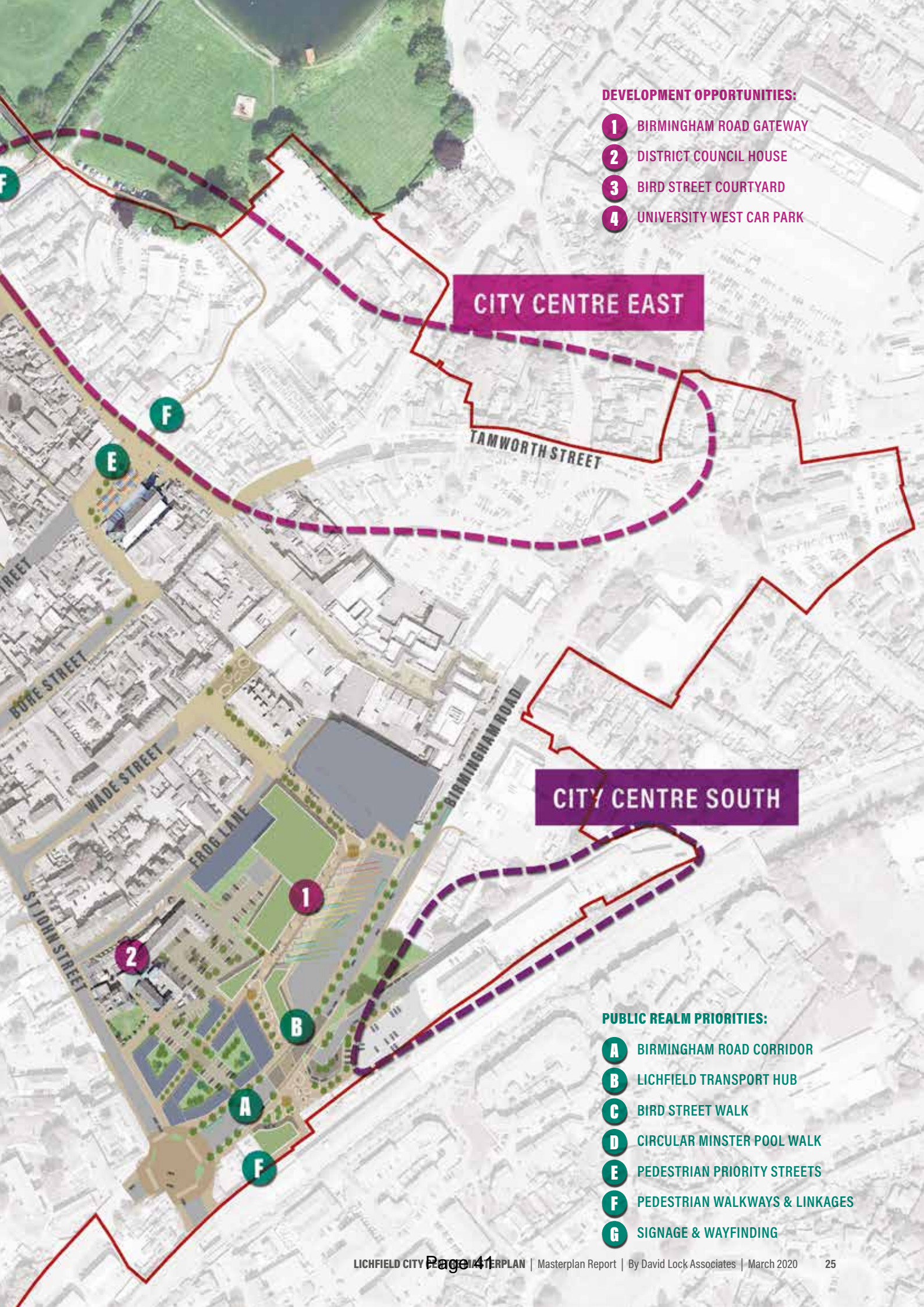
SOUTHERN GATEWAY QUARTER

- 2.70 The Southern Gateway Quarter is focussed around Lichfield City Train Station, Lichfield Bus Station and the Birmingham Road which provides the southern approach to Lichfield. This is a key entrance into the city for visitors arriving by train, bus and car. It is important that the transition from being a driver or passenger to a pedestrian shapes a positive first impression of Lichfield.
- 2.71 Currently, this key approach does not signal arrival into the city centre, with poor public realm and evident areas of disconnect for pedestrians travelling between this Area and the Market Quarter. This greatly impacts upon the visitor arrival experience.
- 2.72 The Birmingham Road provides a significant barrier to pedestrian movement into the city which needs to be addressed. The quality of the Bus Station and car parks also require improvement. A scheme of public realm improvements around Birmingham Road would be significant in revitalising the Gateway and linking in with the city centre.
- 2.73 The availability of the Birmingham Road Gateway site for future development provides the opportunity to 'stitch' together pedestrian links between Lichfield City Train Station, the heart of the City and the cathedral.
- 2.74 This Quarter contains the heritage buildings of the Hospital of St John (Grade I) and part of Lichfield District Council's offices, including the Council Chamber (Grade II). The spires of the Cathedral and St Mary's Church are visible from the Birmingham Road and these important vistas should be maintained and enhanced through the configuration of any new uses on the Birmingham Road Gateway site.



CITY CENTRE WEST





DEVELOPMENT OPPORTUNITIES:

- 1** BIRMINGHAM ROAD GATEWAY
- 2** DISTRICT COUNCIL HOUSE
- 3** BIRD STREET COURTYARD
- 4** UNIVERSITY WEST CAR PARK

CITY CENTRE EAST

CITY CENTRE SOUTH

PUBLIC REALM PRIORITIES:

- A** BIRMINGHAM ROAD CORRIDOR
- B** LICHFIELD TRANSPORT HUB
- C** BIRD STREET WALK
- D** CIRCULAR MINSTER POOL WALK
- E** PEDESTRIAN PRIORITY STREETS
- F** PEDESTRIAN WALKWAYS & LINKAGES
- G** SIGNAGE & WAYFINDING

Masterplan Development Opportunities and Public Realm Priorities

- 2.75 The masterplan has identified a number of Development Opportunities and Public Realm Priorities which collectively will deliver an enhanced city centre offer for people living, working and visiting Lichfield. The Development Opportunities will also contribute to delivering the Public Realm Priorities that are also identified within the masterplan.
- 2.76 The Development Opportunities have been identified having regard to known sites that are available and following discussions between the Council and other stakeholders. The masterplan establishes a strong framework within which development proposals can be shaped and ultimately assessed by the Council. The Development Opportunities and Public Realm Priorities are explained in more detail in Sections 3 and 4 of this report.
- 2.77 It is important to note that should other sites come forward within the city centre that have not at this stage been identified, they will be assessed having regard to the contribution they make to the overall city centre masterplan. The Development Opportunities comprise:

BIRMINGHAM ROAD GATEWAY

A mix of new uses including a Bus Station, alongside public realm enhancements to create a revitalised southern gateway to Lichfield.



BIRD STREET COURTYARD

A mix of new housing and commercial opportunities (a café/bar/restaurant/community uses) to animate Minster Pool Walk with car parking spaces continuing to be provided to the southern part of the Bird Street Car Park site.



2.78 Seven Public Realm Priorities have also been identified to deliver wider improvements to patterns of movement and quality of place. They comprise:



DISTRICT COUNCIL HOUSE

Providing enhancements to the District Council House to consolidate the existing office areas to provide a more efficient work space and to provide for additional commercial/community uses.



UNIVERSITY WEST CAR PARK

A rationalised area of car parking to accommodate parking for coaches and new small-scale offices, suitable for SMEs and start-up businesses.

BIRMINGHAM ROAD CORRIDOR

A The Birmingham Road forms a key element of the Gateway, signalling the southern entrance to the City centre.

LICHFIELD TRANSPORT HUB

B The public transport facilities will be important in presenting a first impression of Lichfield, as people transition from being a passenger to a pedestrian.

BIRD STREET WALK

C Bird Street Walk forms an important pedestrian connection between Bird Street and Market Street where environmental enhancements should be focused.

CIRCULAR MINSTER POOL WALK

D Providing the pedestrian link through the green 'lung' of the City, a new footpath to the north of Minster Pool will facilitate a circular walk.

PEDESTRIAN PRIORITY STREETS

E Interventions within the pedestrianised areas of the Market Quarter will improve safety for pedestrian users.

PEDESTRIAN WALKWAYS & LINKAGES

F There are barriers to pedestrian movement within certain areas of the city which would benefit from enhancements to the public realm.

SIGNAGE & WAYFINDING

G Clear and consistent signage and wayfinding across the city centre will make it easier for people to navigate their way around Lichfield.

Masterplan Transition Areas

2.79 In addition to the Development Opportunities and Public Realm Priorities that have been identified as part of the masterplan, there are also three Transition Areas. These are located at the periphery of the masterplan area and although they do not present specific proposals never-the-less they are important in providing a future opportunity for enhancement.

2.80 The three Transition Areas comprise: **City centre East**; **City Centre West**; and **City Centre South**. Where proposals come forward for each, they will be assessed against the opportunities set out below as well as the masterplan objectives and design principles.





CITY CENTRE EAST

2.81 The City Centre East Transition Area is located on the eastern edge of the masterplan area and runs between Birmingham Road to the south and Reeve Lane and Cross Keys to the north. The area is characterised by a mix of commercial and residential premises and includes extensive areas of public and private car parking. Pedestrian routes, particularly giving access to Tesco to the east, as well as the extensive park around Stowe Pool, cross the site. Key opportunities could include:

- New development to establish a finer grained pattern of development with greater overlooking of adjoining streets and spaces where this would not harm the significance of heritage assets.
- Establishing a better interface between the parkland around Stowe Pool and the rest of the city centre – this could include better signage and wayfinding, opportunities for additional events space as part of the parkland, and temporary camping facilities to accommodate visitors at one of Lichfield's many festivals.
- Additional tree planting along the edge of the Stowe Pool parkland to enhance visual amenity and improved biodiversity in the city centre.

CITY CENTRE WEST

2.82 The City Centre West Transition Area is located to the north west of the city centre masterplan area. It is located in the area between Swan Road and Shaw Lane. The area is characterised primarily by the edge of Beacon Park, as well as various properties access from Beacon Street. Key opportunities should include:

- Enhanced wayfinding and signage to Beacon Park more effectively linking it to the proposed circular route around Minster Pool and Stowe Pool beyond.
- Select infill and redevelopment opportunities on brownfield sites designed to overlook the park and establish an attractive edge where this would not harm the significance of heritage assets.

CITY CENTRE SOUTH

2.83 The City Centre South Transition Area is focused around Station Road. This mixed-use edge of city location provides parking, commercial space, and residential uses and is located within close proximity to the Train Station. Should the opportunity arise, the area could be more intensively developed to provide new business premises or residential development, in a sustainable and accessible location.

Masterplan Design Principles – Ensuring Design Quality

- 2.84 The masterplan is underpinned by design principles to ensure that development in the masterplan area is of a consistently high quality, building on the guidance contained in the National Design Guide and the Lichfield Sustainable Design Supplementary Planning Document (SPD). These principles build upon the masterplan objectives to help guide the design process of all new development in Lichfield city centre.



ONE. ARCHITECTURAL DESIGN QUALITY

- 2.85 Lichfield is a historic city with a number of heritage assets which should be protected and enhanced. New development should be sympathetic to the historic character of the city and local architectural influences.
- 2.86 High-quality contemporary architecture can contribute to the attractiveness and character of Lichfield. This is particularly true where contemporary design is of a scale, massing and height that is appropriate to its context.
- 2.87 The ground floor of new buildings should seek to enliven adjoining streets and spaces through the positioning of doors and windows. 'Active' ground floor uses such as spill-out cafe space in appropriate locations and public uses can help to achieve this as well as the use of balconies on upper floors. Commercial uses will be particularly important along the Birmingham Road, St John Street and Frog Lane to provide opportunities for the street to be overlooked by people in adjacent buildings, thus increasing passive surveillance within the city centre, to improve safety.
- 2.88 An interesting and dynamic roofscape can add visual interest. Ventilation arrangements, air conditioning, lighting, and servicing equipment must be carefully designed and integrated into the overall structure of buildings and should be masked from public view points, particularly onward vistas of the cathedral.
- 2.89 Landmark buildings can help signal important locations in the city centre, such as the corners of junctions between main streets, or key public spaces. They also emphasise the role or status that a particular building has within the city. Landmark buildings are not necessarily tall buildings but include those of special architectural quality and character, those that have distinctive and memorable features (e.g. chimneys) or house special and unique uses. The Garrick Theatre and St Mary's Church are both examples of landmarks in the city centre.
- 2.90 The pattern of different building heights and the location of landmarks play a significant role in helping people to intuitively understand how to reach their desired destination from any point in the city centre. New development must reinforce this pattern, adding to the character, identity and legibility of the city centre. The masterplan identifies locations where landmark buildings will be appropriate and where particular features and corners should be emphasised through the design of buildings.



TWO. MATERIALS AND DETAILING

- 2.91 A palette of high-quality materials will help to firmly establish the character and identity of the masterplan area, both in respect of the public realm and the built form of buildings and structures. High quality materials that are unique to the city centre, or emphasise a particular location within it, must be utilised. This will help to build upon the existing character of Lichfield.

- 2.92 In the masterplan area, a restrained palette of materials should be specified, including red brick and clay tiles as used at the Garrick Theatre and the housing schemes at Chapter House on Monks Close and St John's Almshouses on the Birmingham Road. The image of place will be reinforced by built form, construction materials, decorative detailing, such as balconies, public art and even basic

features such as windows and doorways. These features will also assist in making the area legible, familiar and distinctive. Attention must be paid to the design and detailing of new development.

- 2.93 Bin and recycling storage facilities are important details that are often overlooked in new development resulting in impractical and unsightly bin and recycling storage enclosures. Particular regard must be given to design of these features with storage provided within the building envelope, or as an integral structure designed and specified as part of the building. Adequate design and provision for commercial premises and apartments will be a particularly important consideration. All bin and recycling storage areas must be accessible to refuse vehicles.



THREE. ATTRACTIVE & USABLE PUBLIC REALM

2.94 A clutter of lampposts, servicing boxes, bollards and signage undermines the quality and attractiveness of the public realm and can also act as a confusing barrier to people wishing to access the city centre. Design simplicity is therefore an important consideration. The removal of unnecessary elements and the co-ordination of signage and street furniture is an important aim. This must include a co-ordinated approach to signage and wayfinding across the city centre.

2.95 All too often pedestrians are forced to cross streets and public spaces via the least direct route. A basic principle in the design and layout of all crossings and public spaces should be following the lines that people want to take, not forcing alternatives that then have to be guarded using safety barriers which contribute to street clutter. This will be particularly important for pedestrian cross-routes around the city centre linking together key parts of the city, including crossing the Birmingham Road, St John Street and Swan Road.

2.96 Tree planting complements the public realm by providing visual delight, increased biodiversity, and shade. At present tree planting is most prominent around Minster Pool and the

cathedral. Further opportunities for tree planting in these and other locations will be encouraged through the masterplan to help emphasise the identity of different parts of the city centre. Consideration must be given to future maintenance, overshadowing and leaf drop in selecting locations and species. Opportunities for other types of planting will also be encouraged in the city centre.

2.97 Robust, low maintenance and timeless design must be a key component of any public realm works. A co-ordinated but limited palette of surface materials, such as stone and brick pavements, as evident in Conduit Street, Tamworth Street, Breadmarket Street and parts of Bore Street and Market Street, will provide a strong setting for development. This will help to give a unified appearance to the city centre.

2.98 The specification of street furniture components such as lamp stands, bus shelters, litter bins and seating, must also add to the overall identity, quality and character of the city centre. Consideration must be given to long term maintenance in the specification of materials and street furniture, as well as being robust enough to accommodate different requirements to enliven the city centre e.g. banners, Christmas lights and decorative planting.



FOUR. DESIGNING FOR HEALTH

2.99 New development within the masterplan area should seek to promote an active and healthy city centre. Lichfield is a compact city centre with all destinations within a short walk of each other, which provides opportunities to promote walking and cycling and use of public transport.

2.100 Active travel brings a number of health and wellbeing benefits, including physical activity, improved air quality and stress alleviation. Safe and accessible walking and cycling routes should be provided within new developments, along desire lines and providing direct connectivity with key destinations. These routes should be designed to be overlooked by buildings, well-lit and well-marked to encourage people to walk and cycle. Pedestrian and cycle links between the Train Station, the City Core and the Cathedral require improvement to maximise the opportunities of the compact form of Lichfield, as identified through the Public Realm Priorities.

2.101 The co-location of public, community and leisure facilities within Lichfield can help to facilitate ease of access for all people. Opportunities to explore the potential to co-locate facilities should be utilised, particularly in bringing forward new development at the Birmingham Road Gateway.

2.102 Opportunities to provide new areas of public space should be developed, as set out in the Public Realm Priorities. Streets and public spaces can help to boost the sense of community and civic pride, when designed to encourage social and physical activity. Landscaping and public spaces can also offer areas for relaxation and contact with nature which can improve mental health and wellbeing.

2.103 Further guidance on how Lichfield can be designed for health can be found in the following guidance documents:

- 'Putting Health into Place' by NHS England (2019); and
- 'Active Design' by Sport England (2015).







03

DEVELOPMENT OPPORTUNITIES



- 3.1 This section of the masterplan provides guidance on the four key Development Opportunities that have been identified within the city centre. In describing the Development Opportunities, reference is made to the following:

Existing Uses: this summarises the existing land uses found on the site.

Development Aspirations: this sets out the rationale, form and type of development that could be brought forward on the site and provides an indication of the potential quantum of different uses that may be accommodated on each site.

Key Design and Development Considerations: this details the important elements of the design and development which require careful thought to ensure new uses can be accommodated sensitively, in response to the historic city centre context.

- **Mix of Uses:** indicates the mix of different city centre uses that could be accommodated flexibly on the site.
- **Access Points & Entrances:** provides guidance on the main points of pedestrian and vehicular access to the site.
- **Key Building Elevations & Active Edges:** sets out where the most important and prominent building elevations should be located, and the main active edges which will accommodate principal entrances, shop windows and café and restaurant seating areas.
- **Storey Heights:** guidance on the height of buildings proposed on the site having regard to prevailing heights in the immediate location, scale, height and massing in addition to having regard to maintaining views to the spires.
- **Important Corners:** important corners will be emphasised through the design of the built form, through either height or other detailing. They will typically be located on prominent junctions close to busy streets and pedestrian routes, giving prominence to important places.
- **Parking & Servicing:** indicates where and how parking provision should be made, where it is accessed from, and how the site is serviced, for instance to allow for deliveries.

Implementation Issues: sets out known relevant issues for bringing the site forward for development, for example existing site features to be retained. These are also included in the Delivery Strategy in section 5.

1. BIRMINGHAM ROAD GATEWAY

MASTERPLAN OBJECTIVES TO BE MET:



EXISTING USES

- 3.2 Land adjacent to Birmingham Road comprises of several sites, including:
- the former police station
 - the bus station and associated car parking and coach drop off/ pick-up/ parking area
 - the multi-storey car park
 - the former Tempest Ford garage and showroom
 - the area in front of Lichfield City Train Station, including the taxi rank and area of car parking.
- 3.3 The Birmingham Road multi-storey car park provides 322 short-stay parking spaces with an additional 10 spaces for blue badge holders and 12 compact vehicle bays. The parking area within the Bus Station provides for 61 spaces with an additional 2 spaces for blue badge holders. The surface car parking off Birmingham Road provides 34 parking spaces with one additional space for blue badge holders.

Illustrative artists' impression



DEVELOPMENT ASPIRATIONS

3.4 The Birmingham Road site is the most significant development opportunity in the city centre. It will be reconfigured to provide a new city centre quarter, one that enhances the experience of arrival into the city centre by all modes of transport, and introduces a new mix of leisure, residential, and commercial development opportunities to Lichfield. A new bus station, station forecourt, multi-storey parking will be provided alongside public realm enhancements to create a revitalised 'Southern Gateway' for Lichfield.

3.5 The Birmingham Road Gateway will provide a mixed-use development, with the potential to provide for:

- A new bus station providing around eight bays, with 'pavilion' building (to include public toilets and bus service information, and cycle parking and storage) and a coach drop-off/ pick-up point providing around four spaces.
- A new cinema together with other leisure and restaurant uses at ground floor.
- An hotel.
- Small-scale commercial business space together with a limited amount of convenience retail.
- Residential apartments and houses with provision of a proportion of affordable homes.
- A replacement multi-storey car park accessed from Birmingham Road providing around 480 spaces.

3.6 Coach pick-up and drop-off bays on Bird Street and Castle Dyke will be removed and re-provided at the new Bus Station, to enhance pedestrian accessibility and safety on these roads. This will help to encourage visitors to walk through the city from the Bus Station to spend more time in Lichfield. The compact form of the city centre supports this, with the Cathedral being only a c. 10 minutes' walk from the Bus Station.

3.7 The configuration of the built form must respect the setting and view corridors of the surrounding Listed buildings, including the Grade I Listed Hospital of St John (and associated Master's House to its rear), the Grade II Listed parts of the District Council House as well as the wider setting of the Grade I Listed Cathedral and the overarching Conservation Area which covers the majority of the site. The view corridors of these Listed buildings are indicated on the Public Realm Strategy (see Figure 1 overleaf). New buildings will be required to be of an appropriately high quality.

3.8 The Birmingham Road Gateway site is interdependent with the development opportunities identified as part of the District Council House. The redevelopment of this site will help to integrate complementary community and civic uses within the city centre.

3.8 The development of the Birmingham Road Gateway will also contribute to delivering the following Public Realm Priorities identified overleaf:

- **Public Realm Priority A - Birmingham Road Corridor**
- **Public Realm Priority B - Lichfield Transport Hub**

KEY DESIGN & DEVELOPMENT CONSIDERATIONS

- **Mix of Uses:** a new bus station with 'pavilion' building and coach drop-off/ pick-up spaces. A replacement multi-storey car park on the same site of the existing multi-storey, fronted by active commercial uses to the ground floor. A new cinema, hotel and a supporting café/ restaurant offer will be located centrally within the site. New housing will provide a frontage to Frog Lane. Segregated parking to the rear will be provided for residents and hotel visitors.

On the western edge, small-scale offices with apartments above will be sensitively designed in response to the Grade I Listed Hospital of St John.



- **Access Points and Entrances:** vehicular access will be retained from Birmingham Road to access the Bus Station, new multi-storey car park and Station Road.

A new gateway crossing will be provided from the new Station Square across the Birmingham Road to provide a safe and attractive pedestrian route into the Market Quarter, overlooked by adjacent development.

Wade Street and Frog Lane will continue to provide vehicular access to housing on those streets and the District Council House. It will also provide service access for the hotel, cinema and leisure development as well as new residential development to the western part of the site.

Lichfield City Train Station (and associated taxi and visitor pick-up/drop-off) will be accessible via Station Road.

- **Key Building Elevations and Active Edges:** new development frontages to be provided to the Birmingham Road, Frog Lane and St John Street (as well as the central pedestrianised street) to activate these important routes. Development will be carefully designed to manage the interface between proposed restaurants and the bus station to provide an attractive outlook.

Development will be laid out to establish clear blocks of development distinguishing between the public fronts of buildings and more private rear amenity areas.

- **Storey Heights:** proposals should have regard to the existing vistas to and from the spires of the Cathedral and St Mary's and the potential for new development to create new vistas, including to the Hospital of St John.

Development located in proximity to the Hospital of St John should be no more than 2 storeys in height. Elsewhere development up to 4 storeys is considered appropriate for the majority of the site, subject to vistas of the spires being maintained and enhanced.

- **Important Corners:** important corners and/or public realm treatment will be provided to emphasise the gateway crossing point adjacent to Station Square, including as part of the Bus Station pavilion building and hotel. The building on the corner of Birmingham Road / St John Street must be sensitively designed in response to the setting of the Hospital of St John.

- **Parking and Servicing:** The existing multi-storey car park will be replaced with a new multi-storey car park in its place accommodating some displaced parking from Bird Street Car Park (see Development Opportunity One), the Bus Station and Birmingham Road.. Pricing and future management of the car park, including provision for drop-off facilities will be considered by the Council. Blue badge holder bays will be provided adjacent to Station Square, as part of the pick-up/ drop-off area.

Parking associated with new housing on Frog Lane will be provided to its rear. Parking for guests of the hotel and associated servicing will be provided to the rear of the hotel.

Parking for the residential development to the western part of the site will be accessed from Frog Lane and be provided within development blocks.

An area for servicing will be provided just off Birmingham Road, adjacent to Station Square.

Coach pick-up and drop-off bays will be provided at the Bus Station. Coach parking will be re-provided as part of Development Opportunity Four.

The servicing access to the Three Spires Shopping Centre via Frog Lane will be maintained.

Provision for cycle storage, refuse and recycling bins should be integrated into the built envelope of buildings.





IMPLEMENTATION ISSUES

3.9 The Birmingham Road multi-storey car park is regularly inspected to ensure the car park is structurally sound to operate. Its demolition should therefore form an early phase of the overall development strategy for land adjacent to Birmingham Road. A replacement car park will need to be provided for ahead of Development Opportunity Three due to the displacement of some parking provision from Bird Street Car Park.

3.10 The Birmingham Road Gateway site is owned by Lichfield District Council. Development is likely to be a medium term opportunity. Prior to bringing forward this development opportunity, discussions will need to take place with a number of stakeholders, including:

- Staffordshire County Council as highways authority, regarding any changes to the highway proposed as part of Public Realm Priorities A and B;
- Bus operators within Lichfield, to minimise disruption to the operation of bus services;
- The train operator at Lichfield City station, to minimise disruption to the train station;
- Taxi operators within Lichfield, to minimise disruption to the accessibility of taxi's;

- Lichfield District Council, regarding their wider land interests at the District Council House (Development Opportunity Two);
- The Three Spires Shopping Centre, as an adjacent operator and landowner; and
- The Garrick Theatre, as an adjacent operator.

3.11 Phasing of this Development Opportunity as conceived in the Masterplan is proposed in four main parts: phase 1 could provide the residential development to the western part of the site and fronting Frog Lane. Phase 2 could provide the redeveloped car park along with some leisure and restaurant uses, with phase 3 potentially providing the leisure scheme (comprising hotel, cinema, restaurants and residential development). The final phase would likely be implementation of the new Bus Station.

3.12 Regard must be had to the setting of the surrounding Listed buildings, including the Grade I Listed Hospital of St John (and associated Master's House to its rear), the Grade II Listed parts of the District Council House as well as the wider setting of the Grade I Listed Cathedral and the overarching Conservation Area which covers the majority of the site. New buildings will be required to be of an appropriately high quality.

2. DISTRICT COUNCIL HOUSE

MASTERPLAN OBJECTIVES TO BE MET:



EXISTING USE

- 3.13 The existing District Council House accommodates the offices of Lichfield District Council which are in part Grade II Listed. This includes the Council Chambers which occupies the former school building, to the south of the site. A terrace of former residential properties on St John Street also forms part of the office accommodation with No39 St John Street also being Grade II Listed.
- 3.14 The District Council House is formed of cellular offices and meeting rooms alongside the historic, former residential layout of the period buildings forming part of the premises. The office space is currently underutilised, dated and difficult to navigate.
- 3.15 Car parking for Council staff is provided to the rear of the main building.

DEVELOPMENT ASPIRATIONS

- 3.16 Retaining the Council offices in the city centre will be important in maintaining a civic presence in the city centre and in providing civic services in an accessible location for the public. Council employees and visitors also make a valuable contribution to the city centre economy. Therefore, the importance of the continued presence of the Council offices in the city centre should not be overlooked.
- 3.17 There is an opportunity to make enhancements to the District Council House to consolidate the existing office areas to provide a more efficient work space and to provide for additional revenue generating commercial, residential and community uses. This would act as a catalyst for the wider growth of complementary uses, including small-scale office space within the adjacent Birmingham Road Gateway site, providing an economic boost to the local economy.
- 3.18 The main building will continue to provide office accommodation for Lichfield District Council. The buildings located fronting onto St John Street could provide a self-contained serviced office space or be converted for residential use. The Council Chamber and associated space could be converted to provide a self-contained venue for hire, with the attractive courtyard garden providing outdoor and breakout space. The central section of the building, dating from the 1930's and fronting onto Frog Lane, could be refurbished to also provide commercial office space or community uses, including for use by local groups associated with organising events and festivals. The remainder of the building which dates from the 1980's would be refurbished for continued use by the Council.

3.18 The configuration of the built form must respect the setting and view corridors of the surrounding Grade II Listed buildings and the wider setting of the Grade I Listed Cathedral and the overarching Conservation Area which covers the majority of the site. The view corridor of the Cathedral is indicated on the Public Realm Strategy (see Figure 1 overleaf). New buildings will be required to be of an appropriately high quality.

3.19 Development Opportunity Two could accommodate:

- Consolidated office space for Lichfield District Council within existing building.
- Conversion of part of the buildings on St John Street to provide a self-contained serviced office or residential conversion.
- Conversion of part of the buildings (including the Council Chamber) to provide a self-contained venue for hire.
- Refurbishment of the central section of the building dating from the 1930's to provide a self-contained commercial and multi-purpose community space.

KEY DESIGN & DEVELOPMENT CONSIDERATIONS

- **Mix of Uses:** the main building will continue to provide office accommodation for Lichfield District Council. The refurbishment of the ancillary buildings could provide a self-contained serviced office or residential conversion; a self-contained venue for hire; and a multi-purpose community space.
- **Access Points and Entrances:** vehicular and pedestrian access will be retained from Frog Lane.
- **Parking and Servicing:** parking and servicing will continue to be accessed from Frog Lane. In the evening and at weekends when the venue is in use, the District Council House car park could be used by visitors, where practicable.

IMPLEMENTATION ISSUES

3.20 The District Council House is owned by Lichfield District Council. The District Council House will need to be delivered in phases to minimise disruption to the operation of the Lichfield District Council. Regard must be had to the setting of the Grade II Listed buildings as well as the overarching Conservation Area which covers the site.

3. BIRD STREET COURTYARD

MASTERPLAN OBJECTIVES TO BE MET:



EXISTING USES

3.21 The Bird Street car park is located to the south of Minster Pool, to the west of Dam Street, to the north of Market Street and east of Bird Street. The existing vehicular access to the car park is provided from Bird Street. This doubles up as the servicing access for those commercial units which back on to the car park. There are also a number of pedestrian routes which connect the car park with the surrounding streets. The Bird Street car park provides 169 short-stay surface-level parking spaces with an additional 8 spaces for blue badge holders.

DEVELOPMENT ASPIRATIONS

3.22 The site of the Bird Street car park provides an exciting opportunity to establish a fine grained, multi-use development at the heart of the Market Quarter. Proposals would see the retention of a significant amount of parking in one of the most used car parks in the city centre, together with retained service access to premises in Bird Street and Market Street. However, the public realm would be substantially enhanced to create a landscaped Courtyard, with tree and landscape planting introduced to break up the expanse of hard surfacing and potentially to enable a more sustainable surface water drainage system to be introduced. In addition, improvements to the strategic cycle network would be made along the existing Sustrans National Cycle Route 54 to include new surface paving and signage to provide a clearer, safer and more usable route.

3.23 A new mixed-use development to the north of the site could front onto the Courtyard. The development may provide a ground floor

of commercial uses that would front onto the courtyard parking, as well as providing openings onto the Minster Pool Walk and Memorial Gardens. New apartments could be provided above, with elevations enlivened through the use of full height windows and balconies. The configuration of the built form must respect the setting of surrounding Listed buildings and the overarching Conservation Area which covers the site, as well as views of the Cathedral.

3.24 In the longer term, a more comprehensive scheme could come forward at Bird Street Courtyard comprising adjacent land owned by the County Council and the reconfiguration or redevelopment of retail premises on Market Street. This would provide opportunities for the creation of new civic space linking Market Street and Bird Street Courtyard through to the Minster Pool, and allow for a wider mix of complementary uses to be introduced into the Market Quarter.

3.25 The development interventions at Bird Street car park will also contribute to delivering Public Realm Priority C – Bird Street Walk (see further detail overleaf), with the longer term aim of establishing a significantly enhanced pedestrian route between Larket Street, Bird Street Courtyard and the Minster Pool.

3.26 It is anticipated that the potential development capacity of the Bird Street Courtyard could provide:

- retained car parking spaces including a substantial element of blue badge provision;
- residential apartments at upper floor level; and
- commercial space at ground floor (cafe/bar/restaurant/small scale retail uses).

KEY DESIGN & DEVELOPMENT CONSIDERATIONS

- **Mix of Uses:** the northern part of the site could introduce new residential housing with commercial uses to the ground floor to further animate the Minster Pool Walk. Appropriate commercial uses could comprise the provision of a café, bar, restaurant or community uses. The southern part of the site would continue to provide parking spaces including blue badge spaces and servicing for surrounding commercial units.
- **Access Points and Entrances:** vehicular access will be retained from Bird Street, with pedestrian access from Minster Pool Walk, Dam Street, Market Street and Bird Street.
- **Key Building Elevations and Active Edges:** new development could provide a frontage to Minster Pool Walk. Proposals should reflect the prominent location of this development opportunity to the Cathedral and be sensitively designed.
- **Storey Heights:** Proposals should have regard to the prevailing height of development in the locality with particular regard to vistas to and from the Grade I listed Cathedral. Heights will be determined through detailed design work, and maintain views to the Cathedral.
- **Important Corners:** a careful and considered design response should be given to emphasise the prominent north-west corner of the site, as the principal access into the site from Bird Street. Commercial units providing the gateway route for pedestrians to Minster Pool Walk should be designed in such a way as to enhance natural surveillance.

- **Parking and Servicing:** parking and servicing would continue to be accessed from Bird Street. Some of the parking spaces will be retained with others re-provided at the new multi-storey car park on Birmingham Road (see Development Opportunity One). Provision for cycle storage, refuse and recycling bins should be integrated into the built envelope of the new buildings.

IMPLEMENTATION ISSUES

- 3.27 Bird Street car park is owned by Lichfield District Council. The Council also own two retail premises fronting onto Market Street (currently occupied by New Look and B&M). Staffordshire County Council own an adjoining site to Bird Street car park. Prior to bringing forward this development opportunity, discussions will need to take place with a number of stakeholders, including:
- Lichfield District Council, regarding the part relocation of parking spaces;
 - Lichfield City Council, as the adjacent landowner of Minster Pool Walk;
 - Historic England and Staffordshire County Council's Historic Environment Team; and
 - Operators of the adjacent commercial units, to minimise disturbance to the operation and servicing access of these units.
- 3.28 Bird Street car park has the highest occupancy rates of all car parks within the city and is often effectively full at peak periods. Development on this site will displace some of the existing car parking spaces to a new multi-storey car park to be provided as part of Development Opportunity One. Parking would also be dispersed to other locations in the city centre, which are less well utilised. This would be allied to improved



Wider potential land area owned by public sector

signage and coordination of parking across the city centre. New development on this site will therefore need to be co-ordinated with Development Opportunity One, to minimise disruption. As a result, development is likely to be a medium to longer opportunity.

3.29 Regard must be had to the setting of the surrounding heritage assets, including the Grade I Listed Cathedral as well as the overarching Conservation Area which covers

the site. New buildings will be required to be of an appropriately high quality.

3.30 Consideration will also need to be given to the potential existence of archaeological remains within the site and the need to ensure that any potential archaeological remains are recorded and conserved, as appropriate.

3.31 Any new development will be required to maintain and enhance on-site drainage.



4. UNIVERSITY WEST CAR PARK

MASTERPLAN OBJECTIVES TO BE MET:



EXISTING USES

- 3.32 The University West car park is located to the south of The Friary, to the west of Monks Close and north of South Staffordshire College. The existing vehicular and pedestrian accesses to the car park are provided from Monks Close.
- 3.33 This car park provides a number of long-stay surface-level parking spaces.

DEVELOPMENT ASPIRATIONS

- 3.34 The site of the University West Car Park provides the opportunity to rationalise the area of car parking to accommodate parking for coaches.
- 3.35 Visitors forming part of organised tours are an increasingly important factor in the visitor economy of Lichfield. The limited number of existing coach parking spaces in the Bus Station is a potentially limiting factor to the number of coach trips visiting Lichfield.
- 3.36 Coaches can be parked up at the Bus Station for a couple of hours at a time which provides a poor gateway into the city, particularly for those arriving from Lichfield City Train Station. The peripheral location of the University West car park, albeit only a 3 minutes' walk to Bore Street, would be better suited to accommodate coach parking.
- 3.37 The northern part of the site could introduce new small-scale offices, suitable for SMEs and start-up businesses. Alternatively, residential development could come forward on this part of the site, either associated with the university or for private sale or rental. The central part of the site will accommodate coach parking spaces and car parking. The site would also be suitable for additional hotel accommodation in the city.

POTENTIAL DEVELOPMENT CAPACITY

- 3.38 Development Opportunity Four has potential development capacity to accommodate coach spaces and other parking, commercial business space aimed at SMEs and start-ups, education uses, hotel accommodation, or residential development that could comprise apartments or town houses.

KEY DESIGN & DEVELOPMENT CONSIDERATIONS

- **Mix of Uses:** the northern part of the site will introduce new small-scale offices, suitable for SMEs and start-up businesses.

The central part of the site could accommodate coach parking spaces and car parking.
- **Access Points and Entrances:** vehicular and pedestrian accesses will be retained from Monks Close.
- **Key Building Elevations and Active Edges:** new development should provide an elevation to The Friary/Monks Close.
- **Storey Heights:** office development to be two to three-storeys in height.
- **Important Corners:** development should provide an important corner building to emphasise the frontage to The Friary/Monks Close.
- **Parking and Servicing:** the site will accommodate coach parking as well as public car parking. The office accommodation will be provided with ancillary parking provision. Any displaced car parking at the University West Car Park could be accommodated within the Friary multi-storey car park which is generally under-capacity.

IMPLEMENTATION ISSUES

3.39 The University West Car Park is not publicly owned and therefore this Development Opportunity is subject to agreement and negotiation with the relevant landowner.

3.40 If coach parking is not able to be delivered at the University West Car Park, Development Opportunity One allows sufficient flexibility to accommodate coach parking bays as part of the new Bus Station. The re-location of coach parking within the city centre to this site would however help to maximise the potential of Development Opportunity One to deliver a mix of uses at the Birmingham Road Gateway.



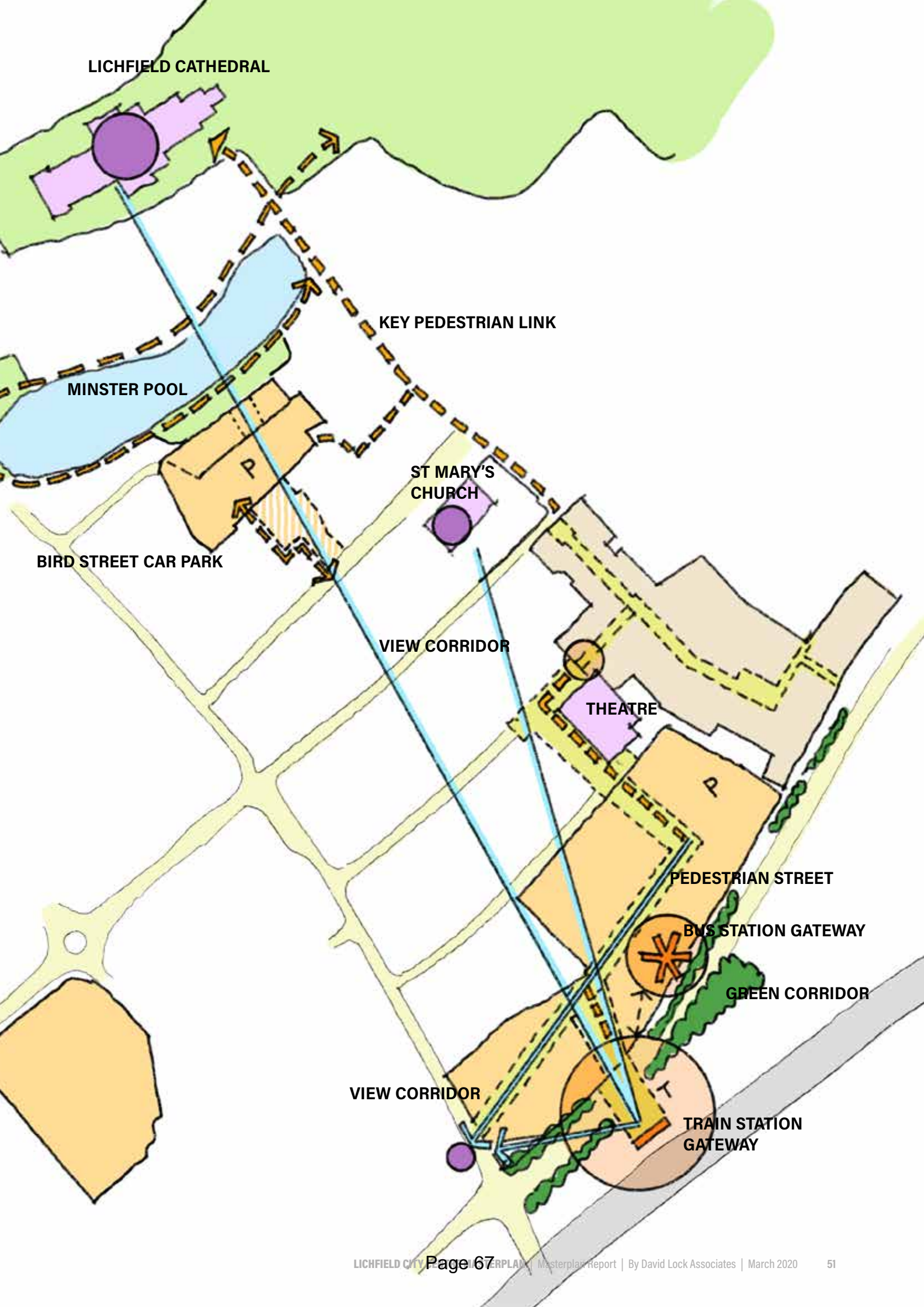


04



PUBLIC REALM PRIORITIES

4.1 This section of the masterplan provides guidance on the seven Public Realm Priorities that have been identified within the city centre, to deliver wider improvements to patterns of movement.



LICHFIELD CATHEDRAL

KEY PEDESTRIAN LINK

MINSTER POOL

ST MARY'S CHURCH

BIRD STREET CAR PARK

VIEW CORRIDOR

THEATRE

PEDESTRIAN STREET

BUS STATION GATEWAY

GREEN CORRIDOR

VIEW CORRIDOR

TRAIN STATION GATEWAY

A. BIRMINGHAM ROAD CORRIDOR

MASTERPLAN OBJECTIVES TO BE MET:



4.2 The highways function (carriageway and associated vehicles) of Birmingham Road is its overriding feature. This provides a poor public realm for pedestrians, particularly as there are limited pedestrian crossing points that follow the natural desire line into the Market Quarter. There is currently no controlled crossing for pedestrians at the junction between Birmingham Road and St John Street, which presents safety concerns for pedestrians. This provides a poor 'entrance' to the City. Enhancements will be dependent upon the completion of the Lichfield Southern Bypass which will free up capacity on the Birmingham Road corridor enabling works to take place.

KEY IMPROVEMENTS

4.3 The Birmingham Road forms a key element of the Gateway, signalling the southern entrance to the city centre. Public realm interventions should be made to the Birmingham Road

Corridor, to improve pedestrian accessibility between Lichfield City Train Station and the heart of the city centre:

- A gateway crossing for pedestrians and cyclists across Birmingham Road, aligned to provide views of St Mary's Church and the spires of the Cathedral from Lichfield City Train Station.
- An enhanced visitor drop-off/pick-up area, with blue badge holder parking and taxi rank directly adjacent to a new Station Square.
- A new 4-way signal-controlled crossing at the egress of Station Road and the Bus Station with Birmingham Road, to allow ease of access and safe movement for all transport modes (pedestrians, cyclists, buses, taxis & vehicles).
- Potential new pedestrian crossing points at the Birmingham Road/ St John Street junction.
- Enhanced street tree planting along Birmingham Road.



B. LICHFIELD TRANSPORT HUB

- 4.4 This intervention is about improving the layout and facilities of the Bus Station and Train Station to make it a more integrated transport hub. It also includes the provision of improved bus service information, such as real time passenger information to indicate at bus stops when the next bus is due. Closely associated with this intervention is the need to improve the quality of the connections across the Birmingham Road (Public Realm Intervention A – Birmingham Road Corridor).
- 4.5 Lichfield Bus Station is located on Birmingham Road, north of Lichfield City Train Station. The passenger experience at the Bus Station is poor. It is also difficult for buses to turn right out of the Bus Station into existing traffic flows on the Birmingham Road, as the junction is not signal controlled.
- 4.6 Lichfield City Train Station provides a gateway into Lichfield by train, although there is a disconnect between the Station, the wider public transport links and the wider City. The Station forecourt is dominated by the carriageway and parked cars, making it difficult for pedestrians to safely navigate their way out of the Station.
- 4.7 The pedestrian route from Lichfield City Train Station into the Market Quarter is not inviting, with only one formal pedestrian crossing across the Birmingham Road. The footpath narrows along parts of the route, with lamp posts often cluttering the route which can act as a confusing barrier to people wishing to access the city centre.



MASTERPLAN OBJECTIVES TO BE MET:



KEY IMPROVEMENTS

- 4.8 The public transport facilities will be important in presenting a first impression of Lichfield, as people transition from being a passenger to a pedestrian. Enhancements to the public realm should be made to enhance the experience of arrival into Lichfield:
- Improved integration of Lichfield City Train Station and the new Bus Station to provide efficient, safe and convenient access for pedestrians.
 - Enhanced coach drop-off and pick-up bays as part of the Bus Station (with coach parking provided as part of Development Opportunity Four).
 - An enhanced public realm to provide a clear and welcoming pedestrian route from Lichfield City Train Station into the heart of the city centre, overlooked by adjacent development.
 - A new Bus Station 'pavilion' building located directly opposite Lichfield City Train Station to encourage linked trips and usage of public transport.
 - A new Station Square to provide an enhanced entrance to Lichfield City Train Station for visitors.
 - A new cycle hub at the station to enhance the facilities available to cyclists.
 - An enhanced taxi rank, directly adjacent to Station Square.
 - Potential shared cycle path along Birmingham Road adjacent to the Bus and Train Stations that could be adapted to fit with proposals currently being worked up for cyclists by Staffordshire County Council along the corridor.
- 4.9 The delivery of public realm improvements as part of the Lichfield Transport Hub is inherently linked with those complementary improvements identified in Public Realm Priority A (Birmingham Road Corridor).

C. BIRD STREET WALK

MASTERPLAN OBJECTIVES TO BE MET:



MASTERPLAN OBJECTIVES TO BE MET:

4.10 The existing public footpath which connects Bird Street Car Park with Market Street is uninviting, poorly lit and not overlooked by adjacent development. This contributes to making this route feel unsafe, particularly for pedestrians using this route at night.



Images above: © www.pinterest.com

KEY IMPROVEMENTS

4.11 Bird Street Walk forms an important pedestrian connection between Bird Street and Market Street. To enhance this important pedestrian connection, environmental enhancements should be made to Bird Street Walk:

- Improved street lighting along its route.
- New planting and rain garden/Sustainable urban Drainage Systems (SuDS) within Bird Street Car Park (Development Opportunity Three – Bird Street Courtyard) and new planting within Bird Street Walk, to create a green corridor extending from Minster Pool Walk.
- Use of colour and street furniture to enliven the space.
- Should the opportunity arise the reconfiguration or redevelopment of premises fronting Market Street could allow for the widening of Bird Street Walk. It would also provide the opportunity to create a new, wider pedestrian route linking Market Street, Bird Street Courtyard and the Minster Pool



Images: © www.greatplacesincanada.ca

D. CIRCULAR MINSTER POOL WALK

MASTERPLAN OBJECTIVES TO BE MET:



MASTERPLAN OBJECTIVES TO BE MET:

4.12 Minster Pool Walk to the south of Minster Pool provides an attractive route within the city for pedestrians. This Walk connects the two important green spaces of Beacon Park and Stowe Pool with the city centre. Careful regard must be had to the setting of the Grade II* listed War Memorial in the Garden of Remembrance.

KEY IMPROVEMENTS

- 4.13 To encourage longer stays and to further strengthen this green 'lung' of linked green spaces, public realm enhancements should be made to Minster Pool Walk:
- Provision of a new footpath to the north of Minster Pool Walk, to enable a circular walk to be established.
 - Additional street lighting to ensure the extended route is well-lit, whilst cognisant of the wider setting of the Listed Cathedral.
 - Active development frontages (i.e. a café, a bar, a restaurant or community uses at ground floor level) could be created as part of Development Opportunity Three (Bird Street Courtyard), to enhance the feeling of safety through activation of this route (e.g. spill-out café space and windows overlooking Minster Pool Walk).
 - In addition, improvements to the existing strategic cycle route through Bird Street Courtyard are proposed to improve east/west cycle provision across the city.



E. PEDESTRIAN PRIORITY STREETS

MASTERPLAN OBJECTIVES TO BE MET:



KEY IMPROVEMENTS

- 4.14 Within the city centre, there are a number of “pedestrianised” streets including Bird Street, Dam Street, Market Street, Bore Street, Breadmarket Street, Conduit Street and Baker’s Lane. With the exception of Baker’s Lane, each of these streets is accessible to blue badge holders and for loading/servicing of commercial units within the central part of the city.
- 4.15 People walking around the central part of the city are often unaware that vehicles can also drive down these streets, which can create safety issues. There is a need to redress the balance between the car and pedestrian, whilst balancing the needs of those requiring access to blue badge holder bays and to servicing areas.
- 4.16 Data on vehicle flows shows that in the peak hours of 10:00-11:00 on a Friday and 08:00-09:00 on a Saturday, up to 80 vehicles and 68 vehicles respectively are often travelling within Tamworth Street, Dam Street, Market Street and Bore Street. Most of these vehicles are circulating to find parking spaces on Bore Street, via the one-way system which directs traffic along Conduit Street, Market Street and Breadmarket Street on to Bore Street.
- 4.17 To improve safety for pedestrian users, improvements should be made to the pedestrianised parts of the city centre:
- The closing of Conduit Street, Market Street and Breadmarket Street to through-traffic, except for permit holders and loading vehicles. Blue badge parking spaces could also be relocated to Bird Street Courtyard or other nearby car parks .
 - Introducing street furniture and public realm interventions such as timber bollards (potential use of automatic bollards) and clear street signage to signal to all users those areas which are pedestrianised and those which are not.
 - Review enforcement of restricted access to vehicles around Market Place and consider options for the redirection of traffic in this location.



F. PEDESTRIAN WALKWAYS & LINKAGES

MASTERPLAN OBJECTIVES TO BE MET:



KEY IMPROVEMENTS

- 4.18 The masterplan advocates walking as the priority means of travel, providing safe and convenient access to the city centre. This means thinking about how people walk from the bus stops, train stations, taxi ranks and car parks as well as from their homes and places of business.
- 4.19 In certain areas of the city, there are barriers to pedestrian movement, including across significant streets. This makes it difficult for pedestrians to easily and safely move around the city. In a number of these areas, the highways function of the street (the carriageway and associated vehicles) have priority over pedestrians, and there is no formal crossing point to facilitate safe crossing.
- 4.20 In other parts of the city, enhancements to the urban environmental quality, through a consistent approach to street design, furniture, landscape and street lighting would enhance the attractiveness of the city centre.
- 4.21 Public realm interventions should be made to enhance existing pedestrian connections, to encourage visitors to dwell longer and to explore the wider assets of Lichfield:
- **Bird Street / Swan Road junction** – to make it easier and safer to cross Swan Road from Bird Street, to access Beacon Park and the northern part of the city centre. This could include a formal pedestrian (zebra) crossing and the narrowing of the carriageway (and the enlargement of the footpath) to emphasise the pedestrian crossing.
 - **Birmingham Road / St John Street junction** – the introduction of toucan pedestrian crossings across each arm of the junction to enable pedestrians and cyclists to safely cross St John Street and Birmingham Road.
 - **Bird Street / Bore Street / The Friary junction** – provision of safe pedestrian crossing points across Bird Street and Bore Street where these streets intersect with The Friary. This could include formal zebra/ toucan pedestrian crossings.
 - **Walkways to Cross Keys and Stowe Pool via alleys** – improvements to these pedestrian routes to enhance safety. This could include improved street lighting and signage to direct pedestrians to and from the city centre.

G. SIGNAGE & WAYFINDING

MASTERPLAN OBJECTIVES TO BE MET:



KEY IMPROVEMENTS

- 4.22 The city centre is widely recognised as being poorly signposted, with little to no means for visitors to easily identify the best route to reach the city's key attractions.
- 4.23 In seeking to promote the city as a tourist destination, it will become increasingly important to provide clear, legible signage and wayfinding across the city centre.

- 4.24 Clear and consistent signage and wayfinding should be provided across the city centre to make it easier for people to navigate their way around Lichfield:
 - Provision of clear and consistent signage/ wayfinding across the city centre, including potential use of public art or Totems.
 - New signage from the Lichfield Transport Hub, to direct visitors to the heart of the city centre.
 - New signage at key intersections and public spaces to signal key locations within the city centre.
 - New signage at the Cathedral, to direct visitors to the heart of the city centre and the Lichfield Transport Hub.

- 4.25 Despite Lichfield's extensive programme of festivals and events, many people are not currently aware of what is on offer within the City. A wider Marketing Strategy should be developed to provide visitor information not only within Lichfield through new signage, but also in raising Lichfield's profile through marketing and social media to encourage people to visit.





05

DELIVERING THE MASTERPLAN

Introduction

5.1 The masterplan for Lichfield has identified a number of projects and proposals including new developments and public realm improvements which are designed to complement and connect with one another. Development opportunities have been explored having regard to known sites that are available and following discussions between the Council and other stakeholders. This section sets out a delivery strategy for those development opportunities and public realm projects set out in Sections 3 and 4 of this report.

Delivery Strategy

- 5.2 Implementation of the masterplan will take place over a number of years. The success of the masterplan will be dependent upon a realistic and focussed approach to enabling development. Creating an environment of certainty, by unlocking obstacles to delivery, will enable the market to take commercial schemes forward with confidence.
- 5.3 The delivery strategy seeks to identify the obstacles to be overcome, and to prioritise delivery in a way that acts as a catalyst. The masterplan sets out a strong framework for delivery of change in the city centre. The proposals concentrate on major areas of change and the supporting strategies that help ensure the city centre functions as a whole.

Viability

- 5.4 Masterplan delivery is dependent on a number of elements working together and viability is a key component in considering development opportunities. Viability will be influenced by a number of factors when taking the opportunity sites forward. These factors may include, but are not limited to:
- Residential/commercial values;
 - The pursued delivery route for securing affordable housing (see Appendix 1);
 - Whether the affordable element of the schemes deliver any value;
 - The potential for certain aspects of the infrastructure to be value engineered; and
 - The potential for elements of a scheme to deliver an income.
- 5.5 As part of the development of the Lichfield City Centre Masterplan, the viability of an appropriate mix of uses and density of development has been assessed. The purpose of the process is to ensure overall deliverability within a flexible framework appropriate to the local property market, and to seek to maximise the potential for value generation.
- 5.6 The sites have been the subject of a high-level indicative viability appraisal. This is a process of assessing whether a scheme is financially viable, by looking at whether the value generated by a development is more than the cost of developing it. The appraisals seek to identify whether the sites are fundamentally viable and deliverable, taking into account the development value, the known costs, land value and developer return. They do not constitute formal valuations and should not be considered or relied upon as such.
- 5.7 The baseline provides an analysis of the prevailing property market conditions in the locality of Lichfield, including residential and commercial sales values, commercial rental values and yields and building costs. This data has been used to assess the scheme development values in the appraisals.
- 5.8 Additional intelligence was gathered in respect of cinema and hotel development and leisure uses, tapping into our knowledge of the expectations of operators and an analysis of similar developments to establish the potential value of these elements.

- 5.9 In respect of the costs side of the appraisals, industry standard development assumptions relating planning and professional fees, surveys, the costs of finance, and assumptions as to the appropriate level of developer's profit were adopted alongside BCIS (Building Cost Information Service) construction costs. At this stage, the costs associated with enabling development to proceed cannot be assessed to any degree of accuracy. The costs that have been excluded are:
- any site acquisition costs, or (if required) compulsory purchase costs;
 - any business relocation costs, such as the acquisition of a relocation site, costs of providing a replacement building, and any business disturbance compensation;
 - any off-site costs, such as those associated with significant highways alterations;
 - any "abnormal" costs associated with for example listed buildings, cleaning up contamination, or unusual ground conditions;
 - the approach to the provision of carbon compliance measures and investment in allowable solutions; and
 - associated infrastructure/public realm costs.
- 5.10 No detailed site surveys have been undertaken at this stage.
- 5.11 For each relevant development opportunity, it has been assumed that affordable housing will be provided with a mix of tenures at a policy compliant level (40%).
- 5.12 The residential market in Lichfield is robust, demonstrating higher sales values than surrounding areas in the region. This generates a positive underlying baseline land value for the residential elements appraised. The healthy values indicate a market demand and clear potential for delivery.
- 5.13 Commercial development is more challenging in the current economic climate. However, where the Council has ownership of the opportunity sites, the value of the land can be reflected in a number of ways in the appraisals to facilitate an overall viable development; either by using positive values created from residential development to cross-subsidise commercial elements or by putting the land in at nil value as part of a joint venture approach.
- 5.14 Where there are significant additional costs to be met, such as those identified above, the levels of value generated overall may not be sufficient to address all the cost requirements. Further detailed work will be needed at the appropriate stage to assess the extent of any shortfall. This is commented on in more detail below.
- 5.15 Although cross-subsidy of the public sector infrastructure has not been considered as part of the appraisal process, there is an opportunity to assist delivery in conjunction with contributions from relevant public sector agencies.

Implementation process

- 5.16 The table identifies the areas of major change which represent the key priorities for action over the next 20 years.
- 5.17 It sets out the potential uses; links between Development Opportunities and Public Realm Priorities; issues and obstacles; and indicative project duration and any anticipated phasing of masterplan projects.

SOUTHERN GATEWAY QUARTER

Project	Description	Ownership	Potential linkage with Public Realm Priorities & improvements
Birmingham Road Gateway	<p>A new bus station, with 'pavilion' building and a coach drop-off/pick-up point.</p> <p>A cinema.</p> <p>Hotel accommodation.</p> <p>Small-scale commercial business space with a limited amount of convenience retail.</p> <p>Residential apartments and houses (including affordable housing).</p> <p>A replacement multi-storey car park (around 480 spaces).</p>	Council Owned	<p>Link to improvements to the Birmingham Road Corridor, including:</p> <ul style="list-style-type: none"> ▪ gateway crossing for pedestrians and cyclists across Birmingham Road; ▪ a new 4-way signal-controlled crossing at the egress of Station Road and the Bus Station with Birmingham Road; and ▪ Enhanced street tree planting along Birmingham Road. <p>Link to improvements to the new Lichfield Transport Hub, including:</p> <ul style="list-style-type: none"> ▪ Improved integration of Lichfield City Train Station and new Bus Station; ▪ a new Station Square; ▪ enhanced visitor drop-off/pick-up area at Lichfield City Train Station, with blue badge holder parking and taxi rank adjacent new Station Square; ▪ Enhanced coach drop-off/ pick-up bays; and ▪ New Bus Station 'pavilion' building. <p>Link to improvements to pedestrian walkways and linkages, at the Birmingham Road / St John Street junction.</p> <p>Internal pedestrian and cycle linkages to existing routes.</p>
District Council House	<p>Consolidated office space for Lichfield District Council within existing building.</p> <p>Conversion of part of the buildings on St John Street to provide a self-contained serviced office and conference centre.</p> <p>Conversion of part of the buildings (including the Council Chamber) to provide a self-contained wedding/ occasion venue.</p> <p>Refurbishment of the southern office building to provide a self-contained commercial and multi-purpose community space.</p>	Council Owned	Interface with Birmingham Road gateway site.

Issues and Obstacles	Indicative Project Duration & any Phasing Implications	Outline process for implementation – actions for Lichfield District Council
<p>Known adverse ground conditions from former Tempest Ford garage use.</p> <p>Priority need to negotiate surrender of existing lease from the Three Spires Shopping Centre of multi-storey car park.</p> <p>Potential (short-medium term) impact of temporary loss of parking on revenue account. Some temporary parking could be provided on the former Police Station site.</p> <p>The expectation is that the multi-storey car park (MSCP) will be constructed in advance of the commercial elements of the scheme to ensure proper operation of the site. It is expected that some gap funding will need to be identified to facilitate this.</p> <p>Potential for direct Council-led development, possibly in conjunction with a development partner.</p> <p>Negotiations required with Staffordshire County Council, as highways authority, regarding any changes to the highway and in providing a new bus station.</p> <p>Negotiations required with Lichfield City Council, the Trustees of St John's hospital, bus operators, train operator, taxi operators, Three Spires Shopping Centre and The Garrick Theatre to minimise disruption to operators and adjacent landowners.</p> <p>New development to have regard to the setting of surrounding heritage assets and to minimise disruption to local residents and businesses.</p>	<p>Indicative timescale 5-7 years.</p> <p>Phased approach, subject to market demand and testing.</p> <p>Phase One: Residential apartments and small-scale business units (western section of site).</p> <p>Phase Two: Re-provision of MSCP along with some leisure and restaurant uses.</p> <p>Phase Two: Leisure scheme comprising hotel, cinema and restaurants, along with residential houses and apartments (central section of site).</p> <p>Phase Four: Re-provision of existing Bus Station with new facility.</p>	<ul style="list-style-type: none"> ▪ Select delivery route i.e. Joint Venture (JV), traditional or hybrid approach (see Appendix 1). ▪ Seek Council approval of preferred approach. ▪ Development Brief. ▪ Negotiations with relevant stakeholders and adjacent landowners ▪ Negotiations required with Network Rail regarding any new development immediately adjoining Lichfield City railway station. ▪ Planning application ▪ Liaison with LEPs to explore funding opportunities for non-commercial elements. ▪ Identify other sources of match funding including S106 and CIL. ▪ Bring forward the site as a development opportunity. ▪ MSCP proposals will need to be informed by a city centre wide Car Parking Strategy to be prepared by Lichfield District Council and Staffordshire County Council.
<p>Required to be delivered in phases to minimise disruption to the operation of Lichfield District Council.</p> <p>New development to have regard to the setting of heritage assets within the Opportunity area.</p>	<p>1-2 years.</p> <p>Phased approach.</p>	<ul style="list-style-type: none"> ▪ Option appraisal. ▪ Seek Council approval of preferred solution. ▪ Development Brief. ▪ Identify internal/external funding. ▪ Dialogue across departments within Lichfield District Council to enable a co-ordinated approach to delivery and to minimise disruption to Council. ▪ Preparation of Business and Marketing plans for new venue space. ▪ Marketing/Negotiations with potential occupiers of sub-let office space. ▪ Bring forward the site as a development opportunity.

MARKET QUARTER

Project	Description	Ownership	Potential linkage with Public Realm Priorities & improvements
<p>Bird Street Courtyard</p>	<p>Public car park (around 55 parking spaces).</p> <p>Residential apartments (up to 12 apartments subject to planning).</p> <p>Commercial floorspace such as a café/ bar/ restaurant/ community uses (2 ground floor units).</p>	<p>Council Owned</p>	<p>Link to improvements to Bird Street Walk, including:</p> <ul style="list-style-type: none"> ▪ New planting and rain garden/ SuDS within Bird Street Courtyard; ▪ Improved street lighting along Bird Street Walk; ▪ Use of colour and street furniture to enliven Bird Street Walk; and ▪ Should the opportunity arise the reconfiguration or redevelopment of premises fronting Market Street could allow for the widening of Bird Street Walk or provision of a new pedestrian link between Market Street and Minster Pool. <p>Link to improvements to pedestrian walkways and linkages, at Bird Street/ Swan Road junction.</p> <p>Active development frontages to be created as part of the Bird Street Courtyard Development Opportunity.</p>
<p>Pedestrian Priority Streets/ improvements to pedestrian walkways and linkages</p>	<p>The re-opening of Lower Bore Street to permitted vehicles (blue badge holders, permit holders and loading vehicles).</p> <p>The closing of Conduit Street, Market Street and Breadmarket Street to through-traffic, except for permit holders and loading vehicles.</p> <p>Introducing street furniture and public realm interventions such as timber bollards (potential use of automatic bollards) and clear street signage to signal to all users those areas which are pedestrianised and those which are not.</p> <p>Improvements to pedestrian walkways and linkages, at the Bird Street/ Bore Street/ The Friary junction.</p> <p>Improvements to pedestrian walkways and linkages, to Cross Keys and Stowe Pool via alleys.</p>	<p>N/A</p>	<p>N/A - Public Realm Project</p>

Issues and Obstacles	Indicative Project Duration & any Phasing Implications	Outline process for implementation – actions for Lichfield District Council
<p>Bird Street car park has the highest occupancy rate of all car parks.</p> <p>Displaced car parking spaces to be re-provided as part of a new multi-storey car park at the Birmingham Road Gateway.</p> <p>Proximity to existing trees could necessitate tree protection works at additional cost.</p> <p>New development to have regard to the setting of surrounding heritage assets and the adjacent registered Park and Garden.</p>	<p>Indicative timescale 2-3 years.</p> <p>Single Phase.</p> <p><i>NB – a later phase could consist of a more comprehensive scheme comprising adjacent land owned by the County Council and the reconfiguration or redevelopment of premises on Market Street.</i></p>	<ul style="list-style-type: none"> ▪ Development Brief. ▪ Dialogue with potential development partners re finance/ funding options for delivery. ▪ Planning application ▪ Dialogue within Lichfield District Council, regarding the part relocation of parking spaces. ▪ Negotiations with Lichfield City Council, as the adjacent landowner of Minster Pool Walk and the Garden of Remembrance. ▪ Negotiations with operators of the adjacent commercial units, to minimise disturbance to the operation and servicing access of these units. ▪ Identify other sources of funding including S106 and CIL. ▪ Bring forward the site as a development opportunity.
<p>Necessity for Traffic Regulation Orders (where necessary).</p> <p>Liaison with adjacent businesses affected by changes including access for customers and servicing.</p>	<p>Over lifetime of Masterplan.</p>	<ul style="list-style-type: none"> ▪ Consider development of Public Realm Design Guide ▪ Scheme design ▪ Implement Traffic Regulation Orders ▪ Develop funding strategy/business plans for funding applications to LEPs. ▪ Identify other sources of funding including S106 and CIL.

CATHEDRAL QUARTER

Project	Description	Ownership	Potential linkage with Public Realm Priorities & improvements
Improvements to Minster Pool Walk, including: <ul style="list-style-type: none"> Provision of a new footpath/ cycle route to the north of Minster Pool, to enable a circular walk to be established. Additional street lighting to new route. 		Public/ Private Ownership	N/A - Public Realm Project

BUSINESS & LEARNING QUARTER

Project	Description	Ownership	Potential linkage with Public Realm Priorities & improvements
University West Car Park	<p>A rationalised area of car parking.</p> <p>Coach parking (at least 10 coach parking spaces).</p> <p>Commercial business space, suitable for SMEs and start-ups (c. 1,800 sqm)</p>	Private Ownership	-

CITY CENTRE WIDE

Project	Description	Ownership	Potential linkage with Public Realm Priorities & improvements
Signage and Wayfinding Strategy	<p>To provide clear and consistent signage and wayfinding across the city centre and at key transport gateways.</p> <p>To provide improvement in legibility across the City Centre and to reinforce identity.</p>	N/A	N/A – Public Realm Project

Issues and Obstacles	Indicative Project Duration & any Phasing Implications	Outline process for implementation – actions for Lichfield District Council
<p>Land in multiple ownerships.</p> <p>New development to have regard to the setting of surrounding heritage assets and the adjacent registered Park and Garden.</p> <p>Existence of mature trees which could potentially require removal.</p> <p>Construction of new footpath in close proximity to Minster Pool.</p>	Indicative timescale 2-3 years.	<ul style="list-style-type: none"> ▪ Negotiations with landowners. ▪ Scheme Design. ▪ Funding including s106 and CIL.

Issues and Obstacles	Indicative Project Duration & any Phasing Implications	Outline process for implementation – actions for Lichfield District Council
<p>Land in private ownership.</p> <p>If coach parking is not able to be delivered on this site, coach parking spaces will need to be provided for within the new bus station, as part of the Birmingham Road Gateway.</p>	Indicative timescale 1-2 years.	<ul style="list-style-type: none"> ▪ Continue to engage with landowner to establish prospects for its re-development. ▪ Development Brief. ▪ Planning application. ▪ Identify other sources of funding including S106 and CIL. ▪ Bring forward the site as a development opportunity.

Issues and Obstacles	Indicative Project Duration & any Phasing Implications	Outline process for implementation – actions for Lichfield District Council
<p>Ensuring new signage and wayfinding is inclusive.</p> <p>Identification of appropriate locations (i.e. having regard to location of underground services etc).</p>	Over lifetime of Masterplan.	<ul style="list-style-type: none"> ▪ Scheme Design. ▪ Develop Signage and Wayfinding Strategy (including consultation). ▪ Identify sources of funding including s106 and CIL.

Timescales

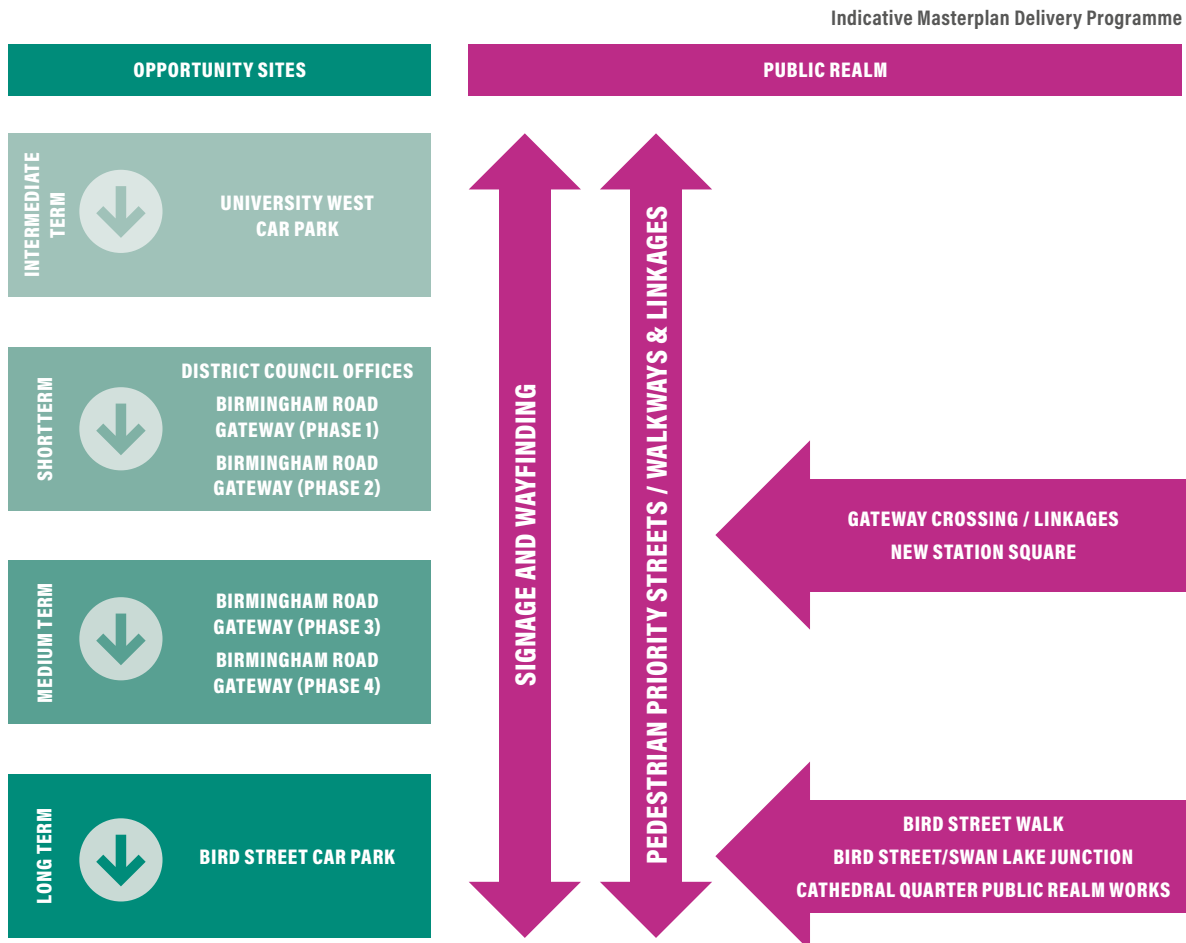
5.17 The sequencing of project delivery will depend on a host of decisions and funding and due to the complexity of the development process are uncertain. In many cases they will be reliant on third party involvement and commitment. However, reflecting the priority of the identified schedule of projects, we have categorised the proposals into short, medium- and longer-term anticipated delivery timescales. In any delivery plan it is important to identify quick wins to carry momentum through from the masterplanning stage.

5.18 A suggested masterplan delivery programme is set out in the diagram below. This takes into account that some of the projects might be complex and long term and involve a number of phases, whilst others will be delivered more quickly. The timescales will rely on certainty about resources.

5.19 The timeframes reflected in the delivery programme are as follows:

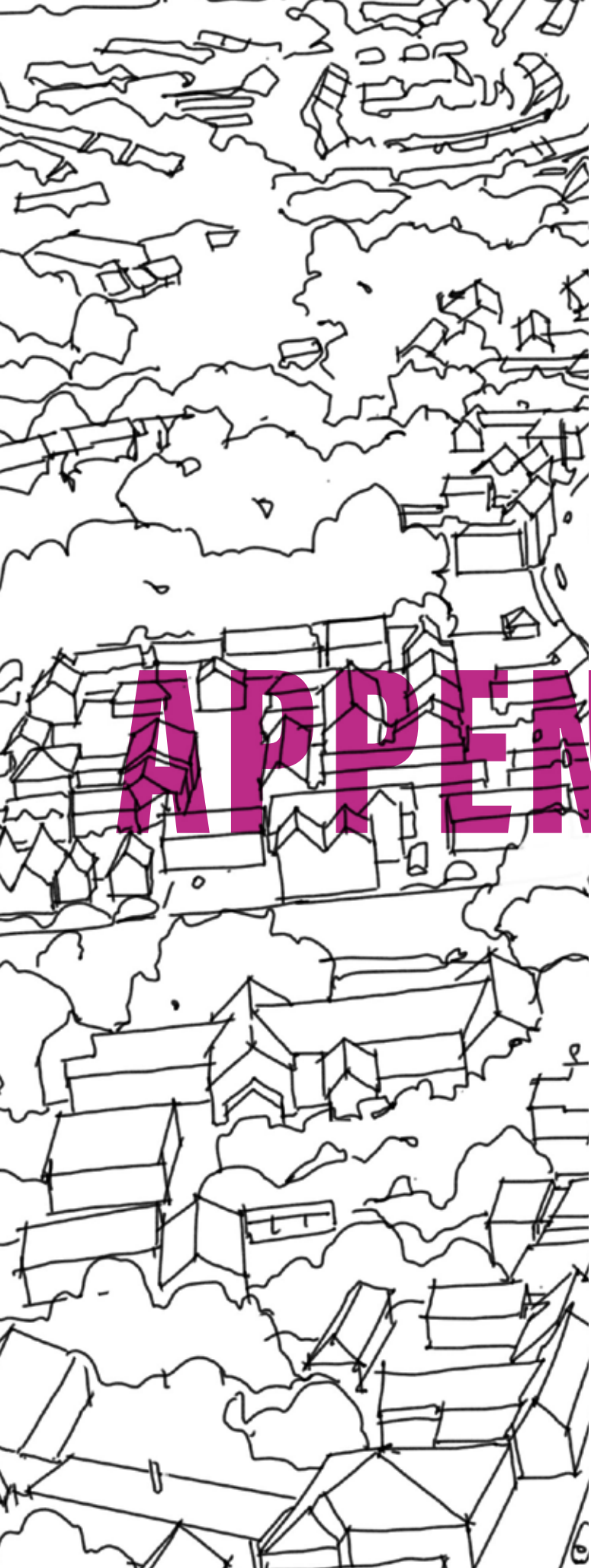
- Immediate years 1-2;
- Short years 2-7;
- Medium years 8-15 years; and
- Long 15 + years.

5.20 As indicated in the table and diagram below, Birmingham Road Gateway will be the most complex of the opportunity sites to deliver. Early phases will play an important enabling role in the delivery of the later, less commercial phases of development. Given the complexity, there are a number of routes to delivery which can be considered. An explanation of these delivery routes is set out in the Appendix 1 to the Masterplan.



Lichfield District Council's Role & Funding

- 5.21 The plan has been prepared at a time of considerable economic uncertainty and cautious levels of private sector investment. In addition to any funds generated through the development of the Birmingham Road Gateway and Bird Street Courtyard sites, the Council will need to assemble a suite of possible funding sources to drive the pace of development.
- 5.22 As outlined above, the high-level viability assessments have indicated that a level of cross-subsidisation could assist in the delivery of public sector infrastructure. However, this will need to be supported by other internal and external sources of funding.
- 5.23 These could include:
- Public Works Loan Board (PWLB) borrowing against future investment income;
 - Community Infrastructure Levy (CIL) – tariffs for infrastructure to help serve and unlock new developments;
 - Working with the Local Enterprise Partnerships to draw down funding to support infrastructure and developments. Lichfield District is a member of two LEPs (Stoke on Trent Staffordshire LEP and Greater Birmingham & Solihull LEP). The LEPs' Strategic Economic Plans provide a strategy for delivering economic growth. LEPs have increasingly become a key source of funding for the delivery of transport improvements through the Single Local Growth Fund;
 - Transport funding from Staffordshire County Council - As Highway Authority, Staffordshire County Council could play a key role via their involvement in the development of the Birmingham Road Corridor and Transport Hub in addition to their support for sustainable travel schemes including pedestrian and cycling initiatives;
 - Contributions from Rail and Bus operating companies; and
 - An application to the Future High Streets Fund.
- 5.24 As indicated above, other public sector bodies will play a role in supporting the masterplan.
- There may be potential to tap into new funding streams and therefore a funding and bidding strategy needs to be considered to allow the Council to be in a position to apply to these new funds when announced.
- 5.25 The above mechanisms can help support development, but the masterplan can also generate self-sustaining investment by creating confidence amongst developers, investors and occupiers regarding the prosperity of the city centre. The masterplan proposals will increase private sector confidence and help create an environment for investment. An open dialogue with developers will help to ensure high quality development can be achieved.
- 5.26 In addition, developer contributions (S106 Agreements) will assist in delivering the masterplan. The Council will need to ensure that development in Lichfield makes its full contribution to mitigating its impact on the environment and on the plans for improved public realm infrastructure. The Council will seek to enter into legal agreements with private developers under Section 106 of the Town and Country Planning Act 1990. This could include agreements for contributions to projects within the masterplan such as
- The improvement to public spaces and wayfinding/legibility in the city centre.
 - Improving facilities for pedestrians and cyclists and car parking.
 - Infrastructure requirements.
- 5.27 Achieving such agreements will be predicated on the financial viability of schemes. As development proposals come forward within the life of the plan, it will be important for the District Council to identify any links with the masterplan proposals and seek to agree a financial contribution.
- 5.28 Overall, the Council's role will be to ensure that developments are shaped to create sustainable and perpetuating value through the most suitable delivery route.



APPENDIX 1

BIRMINGHAM ROAD GATEWAY DELIVERY ROUTES

The site is anticipated to be brought forward in four phases:

1. Phase One: Residential apartments and small-scale business units
2. Phase Two: MSCP, restaurant/leisure uses
3. Phase Three: Residential houses/apartments and leisure – hotel/cinema/restaurants
4. Phase Four: Bus Station (re-provision of existing)

We have prepared a short report outlining our main appraisal assumptions and a summary of the appraisal results. This report is for internal purposes only and is not intended to be published for consultation.

The following sets out the potential routes to delivery. The final route chosen will depend on the Council's approach to risk, reward and appetite for investment.

1. Traditional Route

Delivery through this route entails the disposal of the Birmingham Road Gateway site in return for a capital receipt. The site would be delivered in its entirety by the private sector, which keeps public sector involvement relatively minimal.

It is important to recognise that minimal public sector involvement transfers all risk to the private sector. This includes the risk of delivering a mixed-use scheme and relatively higher borrowing costs. The developer compensates itself for accepting these risks by seeking a high profit, which subsequently affects the amount that is available to be paid to the Council as a capital receipt for the sale of its land.

The implementation process requires the preparation of a development and planning brief for the entire scheme to inform the procurement of a development partner and the negotiation of a development agreement. The parties will then need to agree a detailed design to enable the selected development partner to progress the planning process.

The initial high-level viability appraisal indicates the potential for a positive capital receipt to be generated. While this demonstrates viability, the proceeds are not anticipated to be of sufficient magnitude to cover the full cost of delivering public realm works and make a significant contribution towards the re-provision of the bus station.

It is therefore anticipated that this route will require additional alternative funding to be identified to deliver the wider improvements identified in the Masterplan

2. Split Delivery Route

This delivery route requires the District Council to separate the residential and commercial elements of the scheme.

The residential component would be disposed to the private sector in return for a capital receipt. A purely residential scheme exposes the developer to lower risk, which in turn generates a potentially higher capital value for the Council. The implementation process for the residential element requires a development and planning brief and a sale agreement.

Under this approach, it is assumed that the commercial element together with car parking would be funded by the Council through prudential borrowing and delivered by way of a Development Management agreement and procurement of a contractor. The Council would use its own land, and instead of securing a land value on disposal, would invest on the basis that the income would provide a return on investment. It is anticipated that this would provide surplus income over and above that required to service the debt. This would also give the Council direct control of the commercial units, and their management going forward. This is an approach being more commonly adopted by the public sector across the UK, where the return on investment model can deliver greater flexibility, and enable the Council to determine the mix of commercial uses to best benefit the overall city centre offer over time. Clearly this represents a greater degree of financial risk to the Council, but this is to some extent balanced by the higher capital receipt from the disposal of the purely residential element.

The Council benefits from lower borrowing costs through Public Works Loan Board (PWL) funding, which allows it to deliver the scheme at a lower overall cost than the private sector. There are also no carrying costs on the value of the land.

The initial high-level viability appraisal indicates that the disposal of the residential elements of the scheme could generate capital receipts of more than double that anticipated under option 1 and could also secure a return on investment from the retention of the commercial scheme significantly in surplus of that required to cover loan repayment costs and a prudent sinking fund. This could provide the Council with an income stream that supports further borrowing capacity. This could generate the means to fund significant public realm works and make a meaningful contribution towards the cost and delivery of the bus station.

3. Joint Venture Route

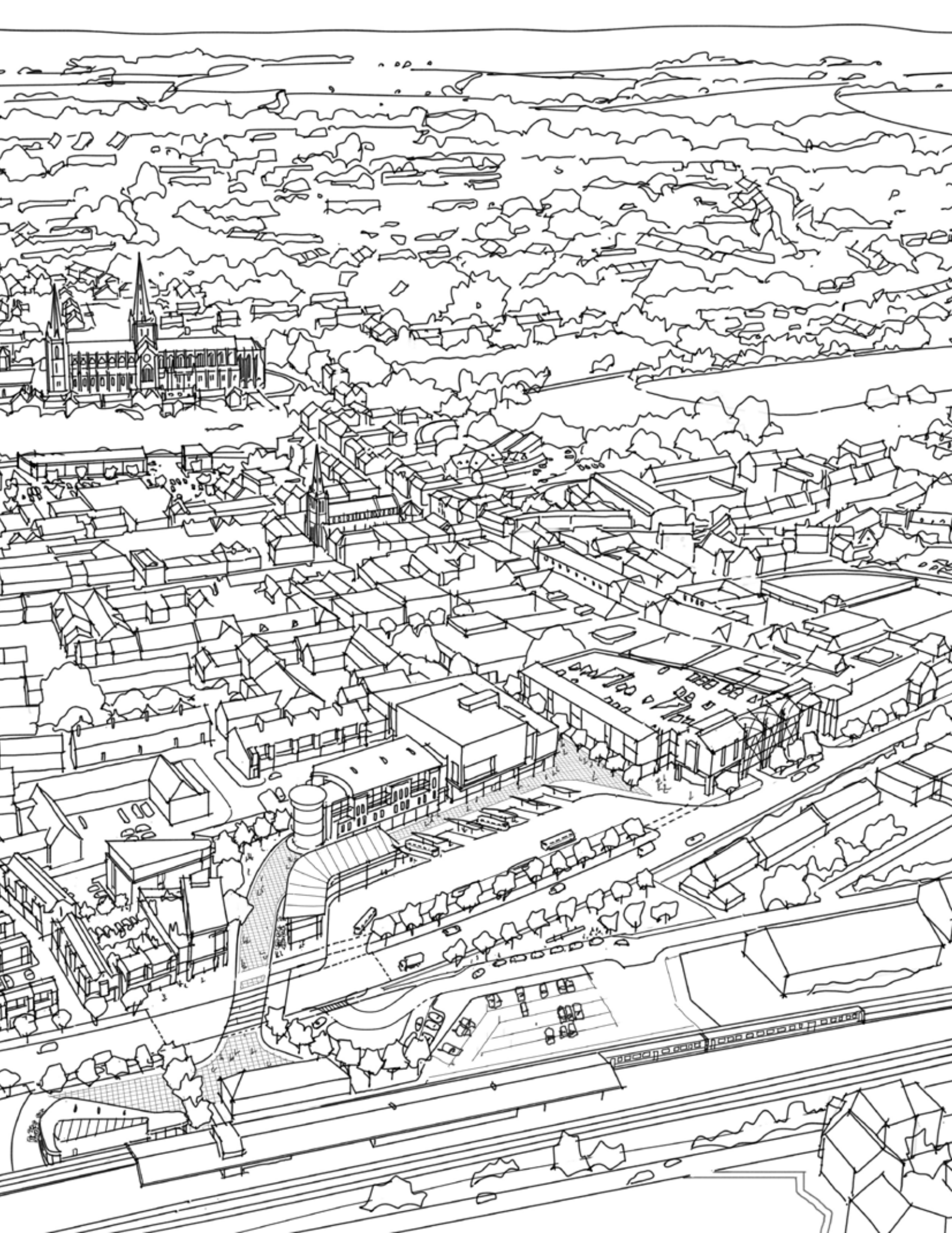
This route requires the Council to deliver the entire scheme through a Joint Venture partnership with a developer (JV). This approach is more similar to the traditional Development partner route set out at 1 above, but involves the Council providing the land at no initial cost and borrowing the funds to meet the cost of developing the scheme. The JV partner is responsible for the construction and bears the construction risk. On completion the residential elements would be sold, generating capital. The commercial investment could also be sold, enabling the short term borrowing to fund the development to be repaid, and the net proceeds shared according to an agreed formula. As the Council is responsible for funding, the scheme benefits from lower borrowing costs, and the JV partner is able to accept a lower level of profit as both carrying costs and risk are reduced, and there is no requirement to privately forward fund the delivery.

The Council's proceeds can be either capital, income if it decides to retain ownership of the development on completion, or a combination of the two; the proportion of which is determined by the JV agreement. The Council's capital receipt is typically determined once the development costs, borrowing costs and the JV partner's profit have been accounted for.

The implementation process requires the procurement of a JV partner and the negotiation of a JV agreement, which carries upfront costs. The scheme will also need to be supported by a development and planning brief and detailed design and planning, as for the more traditional option.

The initial high-level viability appraisal indicates the potential for a flexible outcome involving a combination of capital receipts and revenue. However, whilst this may provide a higher overall value to the Council than option 1, it is important to highlight that, based on the appraisals undertaken, this route is less flexible than option 2 in respect of the available funding and capacity to contribute towards public realm works and the provision of the bus station.





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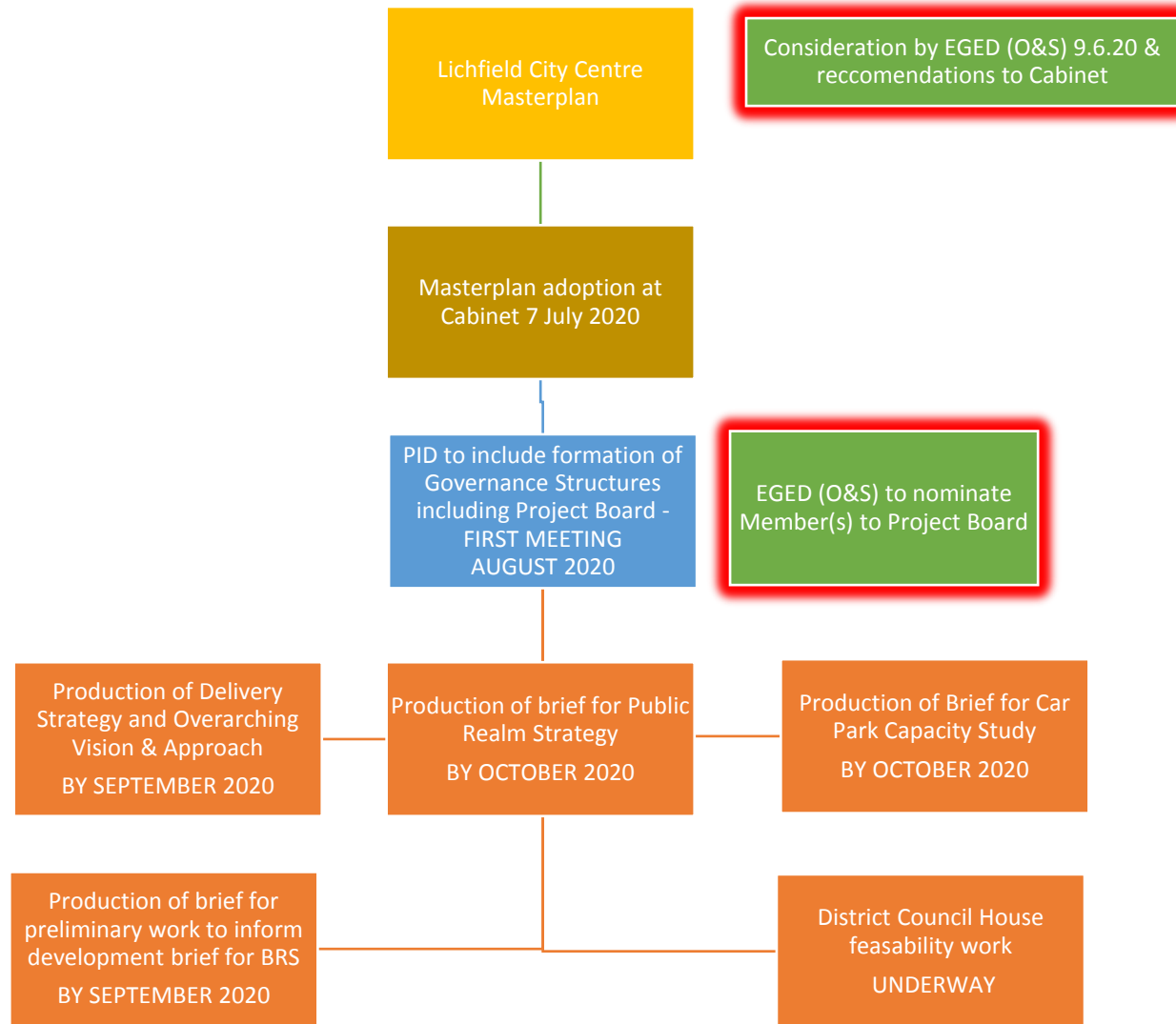
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Local Plan Review Update

Report of the Cabinet Member for Investment, Economic Growth & Tourism
Councillor I. Eadie



Date: 09th June 2020

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Local Ward Members: All Members

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

1. Executive Summary

- 1.1 Members will recall the previous update report presented to this committee on the 11th March 2020. This outlined progress of the Local Plan review including work undertaken to date on recording and analysing the comments received to the Preferred Options consultation held between 29th November 2019 and 24th January 2020. The report also identified the evidence base collection work still to be completed for the publication version (regulation 19) of the Local Plan and the next steps. The same report included a proposed revision to the Local Development Scheme (LDS) timetable to provide the estimated time needed to complete the further work identified. Members supported the proposed revision to the LDS timetable.
- 1.2 This report provides complete details of the representations received to the preferred options consultation together with a suggested response to each of the issues raised. In response to these representations, the Local Plan key issues report has duly been updated.
- 1.3 The report sets out the progress that has been made on the collection and updating of the evidence base. The report also sets out the next steps for the evidence base work still to be completed and potential timelines revisions that may be necessary.
- 1.4 The report also provides an update on Government Guidance related to Statements of Community Involvement.

2. Recommendations

- 2.1 That the Committee notes the updated record and analysis of the representations received following the consultation on the Preferred Options version of the Local Plan.
- 2.2 That the Committee notes the update on progress of the local plan evidence base and the revised timelines for collection and completion of the evidence due to the impacts of Covid 19 pandemic; and the relevant steps being taken to prepare the regulation 19 publication version of the Local Plan.
- 2.3 That the Committee supports the review of the Lichfield District Statement of Community involvement (SCI) to ensure that it is consistent with new government guidance on social distancing.

3. Background

- 3.1 Members will recall the previous Local Plan update report presented to this committee on the 11th March 2020. The report provided an update on the Local Plan review process including a brief outline

of the process undertaken in plan preparation to that date and changes in the content of the Preferred Options version of the plan from the previous version. The report also provided an update in relation to the consultation exercise undertaken on the emerging plan between the 29th November 2019 and the 24th January 2020. It set out the approximate scale of representations received, progress in their recording, and the key issues identified from the comments received to the consultation at the time of writing. The report advised that it would report back to this committee on all of the representations once they had been recorded together with a summary of officer responses. The report also set out the evidence base areas still to be undertaken, completed and updated to support the publication version (regulation 19). Finally it set out an amended timescale for Local Plan preparation in the Local Development Scheme (LDS). It proposed to change the date of the publication version from May 2020 to July 2020. It was envisaged that a report to this committee meeting would pave the way for the publication version (Regulation 19 version) of the plan to be reported to July Cabinet and then if approved, published for representations to be received over a 6 week period during July and August 2020.

Local Plan review progress

- 3.2 Members will recall from the previous report, that whilst most representations had been recorded a fifth of representations still required inputting onto the Local Plan database system. The logging of all representations has now been completed. Appendix A of the report in March also identified the key issues and initial officer responses at the time of writing. An updated **Appendix A** has now been completed and is attached to this report. The only addition is a commentary on the Sustainability Appraisal having regard to the all of the representations received.
- 3.3 **Appendix B** provides a summary of each representation received to the Preferred Options version of the Local Plan and a summary officer response. There were 1084 individual representors including 685 standard responses prepared and circulated by the Burntwood Action Group (BAG). The final total of individual representations received is 1884.

Evidence base

- 3.4 The March 2020 report to this committee indicated that further evidence base collection was required in respect of:
- Infrastructure evidence including transport modelling and updated Infrastructure Delivery Plan
 - Cannock Chase Special Area of Conservation (SAC)
 - Viability Evidence
 - Staffordshire Climate Adaption & Mitigation Strategy (previously entitled as 2 separate areas of work on a Low Carbon Study and Renewable Energy in the March 2020 report)
 - Stage 2 Strategic Flood Risk Assessment (SFRA)
 - Open Space and Green Infrastructure Study
- It was anticipated that evidence in respect of the above topic areas would become available between April 2020 and June 2020 in order to support the publication version being considered in July.
- 3.5 The previous report also identified that it was prudent to facilitate a ‘critical friend’ review of key areas of the existing evidence base to date and to also update the existing evidence base where possible.
- 3.6 With reference to the ‘critical friend’ review, this work has now been undertaken via a planning Barrister. Through this process the Council’s methodology towards evidence gathering has been confirmed to be acceptable and appropriate. Furthermore the Council has been informed how to take forward the evidence to support policy in the emerging plan including critically the application of

sustainability appraisal and compliance with habitat regulations in determining strategy and development locations/sites.

- 3.7 With regard to the representations received from the Preferred Options version consultation in respect of the evidence base, Historic England which is a statutory consultee has identified that it considers Heritage Assessments (HA) for the four Strategic proposals should form an additional piece of evidence. This is so the significance of heritage assets both within the sites and with the potential to experience change to their settings as a consequence of development is understood. There are no other key additional areas of evidence identified as being required from the consultation process. It is considered that the HA evidence can be addressed during June and July providing any potential site survey work can be undertaken as the Covid 19 lockdown restrictions are eased.
- 3.8 With reference to the other areas of evidence base collection requiring completion or update, the impact of the lockdown on Covid 19 is now better understood. Whilst a greater emphasis has been made by officers on undertaking desk based work where possible, since the May Cabinet, it has been identified that some on site survey monitoring work for housing and employment completions will still be required to ensure the data is robust. This work will now need to be undertaken during June. In addition, Sport England has advised that inputs into the evidence base from some sporting bodies will not be possible until July. The Climate Change Adaption and Mitigation Strategy is a Staffordshire wide study being undertaken with neighbouring authorities. It will provide an evidence base on which to identify options for new development to adapt to climate change and allow us to develop local plan energy and climate change mitigation policies that satisfy the requirements of the National Planning Policy framework (NPPF). Since the time of writing the Cabinet report, a slightly revised timetable has been received which now anticipates completion of the work by mid-July rather than during June. The Green Infrastructure Study which is being prepared in-house is on course to be completed during June. The study will identify the network of green spaces that currently exists including parks, woodland and formal and informal green spaces. It can also assist in identifying new sites that will provide the potential for green links within the urban areas through to the rural areas beyond the settlement boundaries. The Cannock Chase Special Area of Conservation (SAC) study work considers the impact of anticipated increased visitor numbers from new development proposed in Lichfield District and other Neighbouring authorities Local Plans on the SAC. This would then inform any additional mitigation measures that may be required. This work can be completed during June subject to agreement by neighbouring authorities identified as impacting on the SAC. Finally, it is anticipated that study work by consultants on viability and on flood risk matters will be completed during June despite the lockdown restrictions.
- 3.9 Having regard to paragraphs 3.6 to 3.8 above, it is proposed that the additional evidence base work referenced can be completed and reported to the Local Plan sub group during July and August in readiness for a progress report by this committee in September 2020.
- 3.10 With regard to the infrastructure evidence including transport modelling, the impacts of Covid 19 restrictions on traffic modelling are still being understood. It is anticipated that the collection of survey data in line with the usual approach to informing traffic modelling will now not be possible until September at the earliest to ensure relatively normal traffic flows can be established. However, Lichfield District Council Officers are liaising with the County Council in seeking to establish if alternative ways of data collection are possible that can be fed into the traffic modelling system. This is to minimise delay and for contingencies to be put in place if traffic flows remain disrupted during the autumn. Finally, the District Council is impressing upon the County Council the importance of the traffic modelling work in preparing local plans for their communities. The Government has recently emphasised in guidance the importance of Local Plan preparation and as part of the Covid 19 Economic Recovery Plan.

3.11 Having regard to all of the above, and in light of the impacts of Covid 19, it is advised that it will not now be possible for the publication version of the plan to be reported to Cabinet in July. The May Cabinet recognised risks associated with CV19 and provided delegated authority to the Cabinet Member to agree further revisions to the timetable to enable local plan progress to be made, subject to any change not delaying the submission of the Local Plan beyond Spring 2021. It is considered that notwithstanding the issues identified in this report, that submission of Local Plan by the Spring of 2021 remains achievable. An update to this committee will be provided at the next meeting on progression on all of the evidence including in relation to traffic modelling.

Statement of Community Involvement (SCI)

3.12 Statements of Community Involvement (SCIs) set out how local authorities will engage with their communities including in respect of preparation of the Local Plan. The Lichfield Statement of Community Involvement (SCI) was last updated in 2019. Since the May 2020 Cabinet report was drafted, the government has published guidance in relation to meeting Local Plan consultation requirements and observing social distancing restrictions. Local planning authorities are strongly encouraged to use online engagement methods to their full potential. Authorities will also need to take reasonable steps to ensure sections of the community that don't have internet access are involved. Accordingly, the Local Authority will commence reviewing its SCI in readiness for the publication version of the Local Plan being issued. It is anticipated that the revised SCI will be reported to this committee and to Cabinet in September 2020.

Alternative Options	<ol style="list-style-type: none"> 1. Lichfield District could seek to issue a publication version of the plan in accordance with the agreed revised Local Development Scheme timetable, however, the evidence supporting policy would not be robust and lay the plan open to challenge with a likely high degree of success.
Consultation	<ol style="list-style-type: none"> 1. Consultation has been undertaken on the previous stages of the Local Plan Review. The Preferred Options document consultation has now closed and responses recorded. 2. The Publication version of the Local Plan when agreed will be open for interested parties to comment on.
Financial Implications	<ol style="list-style-type: none"> 1. Officer time will be needed to undertake future consultations on the Local Plan Review. 2. The costs of consultation will be met within approved budgets. 3. A budget has been established to support the Local Plan Review evidence base.
Contribution to the Delivery of the Strategic Plan	<ol style="list-style-type: none"> 1. Supports the priority of 'Enabling People' through Local Plan preparation which makes provision for growth in housing and other land uses informed by public consultation so they can live healthy and active lives. 2. Supports the priority of 'Shaping Place' through the Local Plan preparation for allocation of new land uses, preserving the districts assets and ensuring growth is done sustainably and with balanced infrastructure provision. 3. Supports the priority of 'Developing Prosperity' through the Local Plan preparation which makes provision for land use allocations including

	<p>employment and residential use, thereby encouraging economic growth, enhancing the district and providing certainty for investment.</p> <p>4. Supports the priority of being a 'Good Council' by accountability, transparency and responsiveness as the update enables the community, business, developers, service and infrastructure providers and other interested organisations to know how the Local Plan review is progressing.</p>
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Equality, Diversity and Human Rights Implications	<p>1. An Equality Impact Assessment accompanies the Local Plan Review document. This will require ongoing update.</p>
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Crime & Safety Issues	<p>1. None.</p>
Environmental Impact	<p>1. The Council is required to assess the environmental impacts of any plan which it produces. Accordingly a Sustainability Appraisal Scoping report accompanied the earlier Scope, Issues and Options version of the plan. Subsequent versions of the emerging Local Plan have been accompanied by a Sustainability Appraisal and a Habitat Regulations Assessment. The Preferred Options Local Plan review version published in November 2019 was accompanied by updated versions of the Sustainability Appraisal and Habitat Regulations Assessment which were also subject to the consultation process. These documents form an important part of the supporting evidence to the local plan review and help the council to assess the possible impacts of the plan and its policies and therefore how impacts can be addressed or mitigated against. These processes will continue to be undertaken at each stage of the Local Plan review.</p>

GDPR/Privacy Impact Assessment	<p>1. A privacy impact assessment was completed for the Preferred Options document.</p>
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	Risk Description	How We Manage It	Severity of Risk (RYG)
A	The quantum of comments received means that officers do not meet the deadlines programmed.	The revision of the LDS approved by Cabinet in May 2020 has allowed for the logging of all of the comments received to the previous consultation.	Green
B	Evidence base requirements emerge that were unforeseen.	Officers will need to continue to assess the need for evidence. The report identifies the future evidence base requirements following review of the representations received to the preferred options consultation and 'critical friend' review of the evidence. The report identifies where possible the timelines required for completing the evidence base. It is considered that any delays can be accommodated within the timelines set out in the Cabinet	Yellow

		report in May 2020 that allow for delegated authority for revisions to the LDS providing the submission version of the Local Plan is by Spring 2021.	
C	Evidence base being undertaken now identifies a risk to the Plan being sound.	Officers will need to continue to monitor emerging evidence base outputs. Where the risk of soundness is identified officers will need to consider all aspects of this risk before recommending an alternative Plan.	Yellow
D	Covid 19 work restrictions cause delay in the collection of the evidence base to support the local plan	It is considered that any delays can currently be accommodated within the timelines set out in the Cabinet report in May 2020 that allow for delegated authority for revisions to the LDS providing the submission version of the Local Plan is by Spring 2021. However, it is important to minimise any delay to avoid the need to have to review whether the existing evidence base is sufficiently up to date and to reduce the potential for further impact on delivery from future changes in national guidance.	Yellow

Background documents

[Local Plan Review Preferred Options](#)

Relevant web links

[Local Plan Review](#)

[Local Plan Review Preferred Options](#)

[Evidence Base](#)

[Neighbourhood Plans](#)

Key Issues	Officer response
<p>Objection and concern at the consultation process undertaken by the Council. Suggestion that not enough was done to promote the consultation, particularly in those areas where strategic development is proposed.</p>	<p>The approach taken for the consultation was reported to members prior to the beginning of the consultation (Cabinet 12/11/2019). The consultation was conducted in accordance with the Council’s adopted Statement of Community Involvement (SCI) which sets out how the Council will undertake consultations. The approach to consultation (set out below) was in excess of the requirements of the adopted SCI.</p> <p>The consultation lasted for eight weeks (extended from six weeks to account for the Christmas and New Year period) during which;</p> <ul style="list-style-type: none"> • Letters (approx.3,200) and emails (approx. 2,400) were sent to all registered stakeholders on the Councils ‘planning policy portal’ to advise of the consultation; • Nine ‘drop-in’ events/exhibitions were held at venues across the District, including in those communities where development was proposed, these were attended by at least three members of the Spatial policy & Delivery Team where exhibition materials and copies of all relevant documentation were available; • ‘Un-manned’ exhibition was set up in Burntwood Library and posters advertising the consultation were placed in Lichfield Library; • Consultation was advertised in the local press and online via the Council’s website and social media platforms; • Members of the team were made available each day throughout the consultation for queries over the phone and in person at District Council House.
<p>The proposed allocations and strategy within the preferred options document has moved away from the settlement hierarchy and approach set out within the previous consultation document (Preferred Options & Policy Directions 2019). Such an approach does not appear to be based upon the supporting evidence and results in development being directed away from certain settlements identified as sustainable within both the evidence and earlier consultation documents. In</p>	<p>Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.</p>

Key Issues	Officer response
<p>particular, some representors make the case that Burntwood should be allocated a greater level of growth given its location within the settlement hierarchy and that other settlements considered to be 'less sustainable' within the evidence and settlement hierarchy are receiving a higher level of growth.</p>	
<p>There is a lack of clarity/justification as to how the allocations and housing requirements for settlements have been arrived at.</p>	<p>A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.</p>
<p>Consideration should be given to the distribution of housing in particular wider distribution to 'service villages' identified within the settlement hierarchy. Plan as written only allows for allocated sites, development within village settlement boundaries or as rural exception sites. Where settlements are allocated a housing number the presence of a neighbourhood plan or neighbourhood area designation does not necessarily mean sites will be allocated.</p>	<p>Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Where neighbourhood plans do not progress and/or do not seek to allocate to meeting housing requirements such issues will be addressed through a local plan allocations document.</p>
<p>The Council should provide less homes to meet the unmet needs arising from within the wider housing market area and that the contribution within the preferred options document has not been justified.</p>	<p>The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period. LDC is working with other authorities in the wider Housing Market Area through the duty to cooperate.</p>
<p>The Council should provide more homes to meet the unmet needs arising from within the wider housing market area and that the contribution within the preferred options document has not been justified.</p>	<p>The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period. LDC is working with other authorities in the wider Housing Market Area through the duty to cooperate.</p>

Key Issues	Officer response
Support for a new settlement approach in future plan period. However, this is unclear at this stage.	Preferred Options document sets out the approach to look for and support a new settlement within the District in future plan periods.
<p>Objection to proposed strategic housing allocation to the West of Fazeley (Policy SHA2). Concern is raised with regard to the following issues:</p> <ul style="list-style-type: none"> • Existing infrastructure, in particular roads, health facilities and schools, will not be able to cope with the level of growth. • Pressure will be on infrastructure within Tamworth Borough. • The scale of the allocation (800 homes) when compared to the current size of the village and that such growth is disproportionate. • No 'exceptional circumstances' to release Green Belt for development. 	The preferred options document details the supporting infrastructure which would be required to be delivered alongside the strategic housing allocation. This includes provision of appropriate school facilities, access and highways infrastructure. The District Council will continue to engage with infrastructure providers to ensure appropriate infrastructure can and will be provided and planned for.
There are no 'exceptional circumstances' demonstrated to release Green Belt within the District.	Green Belt Review 2019 makes clear that 'exceptional circumstances' would need to be demonstrated if changes to the Green Belt boundary are proposed. This has been judged to be the case in the preferred options document as stated at paragraph 16.5 in terms of meeting development needs and the identification of new Green Belt to the north of Lichfield City.
Objection to the release of Green Belt around Burntwood for safeguarded land (at Coulter Lane). A number of responses were also related to this issue but considered that Green Belt was being released for development.	The preferred options document does not propose to release Green Belt at any location around Burntwood for development within the plan period. The document identifies land at Coulter Lane to be identified as 'Safeguarded Land' as defined within national policy. National policy states that consideration should be given that where changes to the Green Belt boundary are being proposed then areas of land between the urban area and the Green Belt (Safeguarded Land) should be identified to ensure the Green Belt boundary is capable of enduring beyond the plan period. The preferred options document identifies areas of such safeguarded land in conformity with national planning policy.
Objection to Green Belt release for development in Hammerwich off Norton Lane & Hospital Road and the 'downgrading' of Green Belt in the area.	There is no allocation or development proposed within the Green Belt in this location. The Green Belt has not been 'downgraded'. The Green Belt Review provides an assessment of parcels of Green Belt as

Key Issues	Officer response
	required by national guidance but does not change the status of Green Belt land.
The Green Belt Review 2019 is not a robust piece of evidence and should be removed from the evidence base supporting the Local Plan Review.	The Green Belt Review 2019 has been conducted based upon the methodology set out within the document. The methodology was subject two consultation with external stakeholders and the public prior to the commencement of the assessment work. The Green Belt Review has been subjected to a 'critical friend' (ARUP) review to ensure the evidence is sound.
Burntwood's infrastructure and amenities do not adequately cater for the past growth and any significant increase in its population is not sustainable.	The proposed settlement hierarchy is informed by the Settlement Sustainability Study which assessed all settlements within the District including Burntwood.
Identification of a strategic housing allocation in Whittington is a different approach to many other villages. Why has the opportunity to identify through a review of the neighbourhood plan not been afforded to the village.	Site identified was considered to be strategic in the context of the village of Whittington. Evidence has been prepared which details the site selection process.
There is a lack of a specific affordable housing requirement (set out as a percentage) within the policy. This does not provide sufficient clarity for development proposals.	Evidence within the HEDNA suggests the Council will be justified in seeking to achieve as much affordable housing as viably possible on appropriate development sites. Further viability evidence is being collected which will inform the policy and provide a clear position in terms of the appropriate level of affordable housing to be sought.
With regard to employment land it should be made clear where new allocations are to be made and where existing allocated employment areas area. Council should consider whether a higher employment requirement is required considering the level of housing growth being proposed.	Existing allocated employment areas are identified on the policies maps which accompanied the Preferred Options document. Current evidence suggests there are limited additional options for locating employment growth, this is explicitly referred to within the consultation document. All possible options will need to be considered as the local plan review progresses.
The Sustainability Appraisal (SA) needs to set out further narrative to explain how the spatial strategy and allocations were selected over reasonable alternatives and the assumptions made in respect of mitigation	Further narrative will be provided as the Local Plan progresses and as additional evidence is collected in order to inform the judgments made.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO1	Mr Paul Cornhill	Policy SHA2: Strategic housing allocation land west of Fazeley	Place on record objection to building on Green Belt as indicated on inset 11 of the local plan review -preferred options. An additional 800 residences in this location will create at least an additional 800 cars which would be the primary form of transport as there is no direct public transport. This would add to the existing traffic difficulties on roads which converge on the Mile Oak traffic lights. Additional homes will also increase the potential accident frequencies by up to 4 accidents a year. 800+ vehicles would generate approx. 3,700 tonnes of CO2 each year along with increased levels of NOx and So pollution. Development would create new community of 2000 people including 300-600 children. This will require schools, support services, doctors, clinics, leisure facilities and other utilities. Much of this provision would fall to Tamworth a facilities in Lichfield are not accessible. Development would have a major impact upon the environment and increase flood risk. This poor choice is compounded by the fact it is aimed at Green Belt land when there are plenty of brownfield sites available. There is a disproportionate level of growth given to Fazeley when considered against the level of growth proposed at Burntwood based on population and number of existing homes.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.
LPRPO2	Mr Damien Carter	Policy SHA2: Strategic housing allocation land west of Fazeley	Land along Sutton Road is currently Green Belt and I am outraged that building houses on this area of beauty. The idea that the natural beauty will be destroyed is terrible. This cannot go ahead.	The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.
LPRPO3	Clare Parslow	Policy SHA2: Strategic housing allocation land west of Fazeley	Objects to proposal as 800 houses are going to create approximately 1600 extra cars in an area that is already suffering serious congestion, there are often queues of up to 15-20 minutes at busy times of the day. The roads cannot cope with the added traffic nor can Mile Oak traffic lights. Concern that schools, doctors, dentists and other necessary amenities are struggling to cope with the existing demand. Wicked to destroy more fields and loose Green Belt for more houses that will have detrimental effect on the area. Often see birds of prey and other wildlife on the site and enjoy walking across the area with family. Area already under threat from HS2 and this will destroy even more. Natural wildlife areas and green fields are already under so much threat and if development carries on the way it is we will just be living in a concrete jungle. I want my children to be able to go to open green spaces, I don't want then surrounded by concrete. If I wanted this I would live in a city. Tamworth is a town and Mile Oak a village. Why try and make it something that it isn't? The current utilities in the area are never going to be able to cope our water pressure is already at the bare minimum and not to mention the sewage system. I dread the thought of this housing development going ahead as I think it will destroy a lovely area and will no doubt have a negative effect on our house prices.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO4	Roger Pearshouse	Policy SHA2: Strategic housing allocation land west of Fazeley	The historic market town is slowly seeing and losing its identity in part due to development. The infrastructure already is under great pressure already and the building of 800 new homes will only exacerbate the situation. Traffic congestion is at bursting point. The roads are in an appalling state with potholes everywhere which the building of 800 homes with an average of two cars per home giving 1600 extra vehicles seems like a very big step in the wrong direction. Extra schools will be needed, where would these be built not to mention the extra doctors and hospitals to cope with what is a very large influx of people. There is extra emergency services that will be required. It also needs to be said that the beautiful countryside in the area which is already badly defaced by HS2 should now be joined by a development of such a size will not be just a carbuncle on the face of what was once a tranquil and serene landscape but a terrible drain on resources of the area. Better the area should be planted as forest where it would at least be of use to both wildlife and humanity alike.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO5	Paul Simcox	Policy SHA2: Strategic housing allocation land west of Fazeley	I've learned of a plan to build 800 new properties in the area south of the Mile oak Junction. If this is the case has anyone taken the time to consider the people who already live in the area and the impact this will have on a bottleneck junction. Can I suggest someone tries to het from bassets Pole to Ventura Park. I would suggest this takes around 45 minutes to an hour and a half.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO6	Christina Lunn	Policy SHA2: Strategic housing allocation land west of Fazeley	Further housing in this location isn't required as there is insufficient infrastructure to cope with current levels of housing. If Lichfield District Council want more housing this should be located somewhere else and the additional expenditure require for amenities for residents. It would be better to build on brownfield sites rather than destroying greens spaces we have as this lead to more flood and loss of wildlife. None of this housing will be affordable and will be three storey townhouses/tenements.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO7	Steve Nozedar	Policy SHA2: Strategic housing allocation land west of Fazeley	Not fundamentally opposed to residential development, but has concerns that the land is adjacent to the already busy A453 Sutton Road commuter route. 800 new homes will bring an additional 1000 vehicles. It is noticeably more busy on a weekend, this traffic volume is as a direct result of the successful and excellent shopping facility at Ventura Park. Further concerns exist over parking and traffic volume being dangerous for pedestrians, particularly ones wanting to use Tamworth bound bus stops. There is also concern that these 1000s of extra homes will lead to a huge increase in demand for medical, social care and school places, which will overwhelm existing infrastructure.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.

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LPRPO8	Kevin Pike	Policy SHA2: Strategic housing allocation land west of Fazeley	Place on record that I am against the proposal to allocate Green Belt Land for up to 800 homes between Sutton Road and Hints Road, Mile Oak on the grounds it will create a tremendous amount of additional traffic and furthermore you have not taken into consideration local infrastructure. Local amenities such as schools, hospital, doctors, dentists, schools will not be able to cope with the additional population. Restricted speed limit from Gainsborough Drive to Mile Oak Traffic lights is largely ignored. There have been a considerable number of fatalities over the last 20 years together with several life changing situations for those who have been seriously injured. It is unlikely that CO2 emission targets will be met if this proposal is passed. The manner in which this proposal has been announced to the public is deceitful. My questions are: 1) When is the proposed date to approved the development? 2) When will building commence and finish? 3) Have you decided to install traffic lights along the Sutton Road for access to the development. if so, it would be of great assistance if these traffic lights were opposite Gainsborough Drive.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The approach taken for the consultation was reported to members prior to the beginning of the consultation. The consultation was conducted in accordance with the Council's adopted Statement of Community Involvement (SCI) which sets out how the Council will undertake consultations.
LPRPO9	National Grid Plc (Avison Young)	Whole document	We have reviewed the above document and can confirm that National Grid has no comments to make in response to this consultation.	Comments noted.
LPRPO10	Eddie Jones	Policy SHA2: Strategic housing allocation land west of Fazeley	Reference the Development of land West of Fazeley. I feel that the scale of the development (800 homes) would have a negative effect on local wildlife that would be very difficult to mitigate. We have a duty to ensure that existing plant and wildlife species continue to thrive. Also, the existing road infrastructure would not be able to cope with the increase in traffic without major changes.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO11	John Mills	Policy SHA2: Strategic housing allocation land west of Fazeley	I feel the need to register my complete opposition to the building of 800 dwellings as part of the strategic allocation to the south west of Mile Oak junction. The road I live on leads onto the Sutton Road and I have noticed a massive increase in traffic over the last 17 years due in no small part to the extra housing building that has taken place. It is resulting in an unbearable levels of traffic congestion along the Sutton Road and impacting in a negative way to the quality of life for residents. I believe that if large scale house building is to take place then extra road capacity should be a prerequisite along with improved transport links and an increase in spending and provision for public services (GP, schools).	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO12	Patricia Arblaster	Chapter 19: Burntwood	I have read with dismay the plans to build approx. 850 more homes in Burntwood on Green Belt Land. Burntwood is already too big for the infrastructure that is in place at the moment and with the building of houses in New Road. Burntwood was a beautiful place to live whilst I understand that there are more people to be housed we are loosing the sense of community and do not have the extra facilities to deal with population growth. Do not have enough police presence. Schools will not be able to cope and it is already difficult to get a doctors or dentist appointment in the area. Sankey's Corner shopping centre is very outdated and lacks the kind of shops that are needed in the area. The parks while nice are quite small and have not been updated for years. We have no leisure facilities except for the recently opened gym and the leisure centre. We were promised a cinema, more and varied shops. None of this happened but still we have more houses. Consider the people as a whole and try and keep Burntwood a lovely place to live and not just a poor relation to Lichfield.	The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO13	Iain & Sharron Beadle	Policy SHA2: Strategic housing allocation land west of Fazeley	As residents of Sutton Road, Mile Oak and ultimately Tamworth we have read with incredulity your proposed concept of 800 new homes in the Mile Oak area. Having lived at this location for the past 12 years we have seen a significant increase in traffic and air pollution on the Sutton Road (A453).The A453 is a very fast & dangerous road already overloaded with vehicles, only a few years ago a car left the road and killed a pedestrian walking on the pathway. At peak travelling times it is then practically at a standstill, creating air pollution. Furthermore we do not have the infrastructure of medical services, schools or local services to support this growth of housing without further investment of local services. Our local services are already stretched. In addition your proposed build plan is on green belt land, an area of natural beauty that contains Bats, (which I understand are a protected species) birds of prey, badgers, rabbits, foxes not to mention the wildlife in Bourne Brook also. However, for the reasons listed above this planned extension of 800 homes on green belt land is not progress but a damaging step to further overwhelming Tamworth's roads and services.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.
LPRPO14	Mary & Paul Aplin	Chapter 19: Burntwood	It seems there is no thought regarding the infrastructure of this area and we feel that before the council should allow more housing in Burntwood they should seriously look at the facilities in Burntwood. GPs - getting an appointment with a doctor is becoming impossible. People from Burntwood have to travel many miles to get to a hospital for simple procedures. Road systems - getting out of Burntwood is becoming more and more congested and the impact of additional housing will only add to this problem unless thought is given to our road network. These are just two areas of concern, I am not in a position to mention schools which I assume are at capacity or will be by the time more housing filters through. We do not think any more development should take place until the infrastructure of the area has been improved.	The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.

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LPRPO15	Malcolm Tucker	Policy SHA2: Strategic housing allocation land west of Fazeley	The location of the site for an estimated 800 new homes would relate to approximately 1600 vehicles within the area. Several times during the Christmas period the traffic at rush hour was at a standstill in both directions from Mile Oak. There are only two main routes from Tamworth to Birmingham both of which can be grid locked. Why not relocate the proposed development between Lichfield and Brownhills or Lichfield and Cannock. There is no bus service between Mile Oak and Lichfield, therefore all shopping would more than likely be directed towards Tamworth. Also with an estimated increase in approximately 400 children, although there is a school proposed there will not be enough school places. Furthermore the medical facilities would not accommodate such a large population increase. You are unable to get an appointment with the local medical centre to see a GP. Shopping facilities at Ventura are over committed with serving the people in the area that it is becoming un-accessible. Consider that the green belt around Tamworth is being depleted for the benefit of Lichfield Town centre where in effect the green belt closer to Lichfield is more accessible and plentiful. Hints residents have not had any formal notification of this proposal and the majority are unaware of it.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice. The approach taken for the consultation was reported to members prior to the beginning of the consultation. The consultation was conducted in accordance with the Council's adopted Statement of Community Involvement (SCI) which sets out how the Council will undertake consultations.
LPRPO16	Michael Edwards	Policy SHA4: Strategic housing allocation land of Huddlesford Lane	If the proposed plans for extra Housing in Whittington should go ahead There would obviously be an increased need for places in our local school . This in turn means extra traffic flow in Common Lane. May I suggest that LDC seeks a sympathetic farmer from whom to buy a parcel of land opposite Whittington School to create a car park for parents. I would imagine that space for 50 vehicles would be a minimum requirement! I would also point out that the new entrance for Whittington Heath Golf Club will also be off Common Lane giving even more traffic flow and potential congestion.	Comments noted. Policy SHA4 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review.
LPRPO17	Ian Turner	Policy SHA2: Strategic housing allocation land west of Fazeley	I have been a resident on Sutton Road for 16 years, over this time there has been a visible increase in the volume of traffic along the A453. I have personally witnessed several vehicle accidents on this road. At times the traffic volume has been such where it tail backs along the A453 have been substantial in either direction. This has led to impatient and dangerous acts of driving. The risk of incident due to the increase in vehicle volume using the route must surely be increased by additional housing.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO18	Thomas	Policy LA1: Little Aston environment, services and facilities	Reference is made in 20.53 to Little Aston being in the most sensitive green belt corridor in the housing market with particular concern expressed about Fotherley being linked to Little Aston. But there are other locations in Little Aston which should also be noted. The phrase "Little Aston should keep its individual identity". This is a very worth while aim which should apply not only to the conservation area which receives frequent mention but also the other parts of the settlement.	Comments noted.
LPRPO19	Thomas	Policy OHF1: Housing provision	It is important that the Greater Birmingham and Black Country Housing Market Area is not allowed to regard Lichfield District as simply a natural extension of Birmingham and the Black Country. Transfers of new builds to Lichfield should only be exceptional and fully justified. Otherwise Lichfield will not have a chance of integrating unmet housing demand from outside the District with locally generated demand and the essential character of existing settlements in Lichfield District. Does it have to be 4500 houses from unmet needed or is a lower figure possible?. In terms of housing completions the 4500 might be optimistic. It seems to be based on the assumption that the average completions of just three years to April 2019 can be sustained throughout the entire plan period.	The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review.
LPRPO20	Thomas	Policy NS1: New settlement	The system of trying to spread new houses around the district settlements large and small on a reasoned basis will eventually not be able to cope and would probably lead to unwanted changes in the settlements. The obvious policy to follow would be for a new settlement to be established in the district.	A component of the spatial strategy is the development of a new settlement within our district, so we can provide certainty to our communities and the development industry about how we intend to grow the district in the long term, this is policy NS1: New settlement
LPRPO21	Thomas	Policy LA1: Little Aston environment, services and facilities	Various dissatisfied remarks are made about the usefulness of Blake Street railway station with regard to Little Aston. This is hardly surprising with its general difficulty of access to Little Aston residents. Despite not offering the same level of accessibility to residents as Shenstone station the Settlement Sustainability Study scores the same number of points. It is simply not credible that local residents are frequently using long tedious train journeys to access their services when Sutton Coldfield and Lichfield are nearby.	Comments relate to the Settlement Sustainability Study evidence. The methodology for this evidence is applied consistently across the district.
LPRPO22	Margery Hateley	Policy SHA2: Strategic housing allocation land west of Fazeley	[Representation left blank]	Not applicable.
LPRPO23	Margery Hateley	Picture 20.1 & Policy SHA2: Strategic housing allocation land west of Fazeley	Disagree with the allocation of Green Belt land at SHA2. A development of this size is in completely the wrong location. The traffic currently passing through Mile Oak junction is dangerously overloaded. Tamworth railway station is 3 miles away with very limited parking so would not encourage commuters. It would not enhance to existing communities in any way whatsoever all it would do is create another new community. Local businesses would not benefit. Fazeley needs regeneration itself without adding further to its short comings. No consideration has been given to the effect traffic will have on Ventura Park and Drayton Manor Park. We have to protect this Green Belt site and what remains of the beautiful local countryside and consider not only the effect it will have on our own health but also local flora and fauna.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.
LPRPO24	Margery Hateley	Policy F1: Fazeley environment	The vision is confusing and contradictory. I feel to see how allocation SHA2 will lead to the communities of Fazeley becoming more prosperous and better connected. SHA2 would destroy acres of valuable countryside and remove valuable green open space, not improve it. Disagree that there should be provision of 924 new dwellings. Development of this size is totally disproportionate and not needed for the community. It would worsen traffic and add extra pressure to services in Tamworth and Fazeley. Disagree with the allocation of land identified as SHA2.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.

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LPRPO25	Margery Hateley	Policy F1: Fazeley environment	Disagree with wording of 20.21 [paragraph] as we do have a quality environment in most residential areas. Allocation of SHA2 would worsen the health and wellbeing of existing residents not improve it. Fazeley requires regeneration and do not see how SHA2 would achieve this objective.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO26	Margery Hateley	Policy F3: Fazeley economy	SHA2 would only lengthen the settlement and put further strain on resources. It would add additional traffic to an already heavily congested area. Traffic to Drayton manor park adds pressure to the road system, as does Ventura park.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO27	Pauline Greenhill	Policy SHA2: Strategic housing allocation land west of Fazeley	We have been a resident of Hints for 24 years, we pay a huge amount of community charge for semi countryside living and we get barely any services save for bin collections and now you want us to suffer the inconvenience, congestion and nuisance of this abortion of an idea. As it is one cannot get an appointment with a GP or dentist and there is traffic everywhere with parked cars and motorists ignoring red lights. We already have a train to put up with and the chaos that will cause. We think its high time that Lichfield used there own space for these developments.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO28	Clive Thompson	Policy SHA2: Strategic housing allocation land west of Fazeley	I am a resident of Bonehill and have 30+ years' experience in highway traffic management, junction design, accident reduction schemes and general highway management. Significant delay and congestion currently occurs during peak periods, on the 2 A453 approaches .Significant queues on roads around the junction. The proposed development of 800 new homes adjacent to the south-west of the junction will no doubt exacerbate the problem particularly due to the much higher than current demand for the right-turn from A543 into B5404. No pedestrian stage is provided at the traffic signals nor are there any tactile paving or dropped kerbs. The roads at the junction are difficult for pedestrians to cross in safely and particularly challenging for the elderly, disables and wheelchair users. Analysis of the sites 5-year road accident record reveals that up to 30/06/19 there were 4 injury accidents reported to the police at this junction. There are no cycle facilities at the junction or any of the approaches. Some carriageway sections are deteriorating and the pedestrian footways are poor. It is clear from the above assessment that the Mile Oak junction will require significant improvement to overcome the current problems many of which will be considerably exacerbated by the proposed development.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO29	Kay Aldworth	Policy SHA2: Strategic housing allocation land west of Fazeley	Wish to strongly object to the proposed development on the following grounds. 1) The extra traffic impact it will have on A453 and surrounding roads. A453 is already overused at peak times and when traffic is diverted causing massive hold ups. This is not an unusual occurrence. 2) Impact on carbon footprint. 3) Traffic to and from Ventura Park - most residents will be shopping in Ventura Park which is gridlocked on a regular basis which causes feeder roads to grind to a halt. 4) Tamworth has already endured a massive increase in housing development surely other areas could be considered suitable. Why are they not taking their fair share of increased housing developments? 5) Air pollution will increase. 6) Impact on local wildlife and loss of its habitat. The impact of HS2 and the proposed development will have on wildlife will be catastrophic.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO30	Carl Darby	Whole document	As part of the comments you are accepting as part of the local plan review, I would like to state that I am in favour of opening up the use of existing gardens and small plots for building that are within green belt.	Comments noted. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.

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LPRPO31	Burntwood Action Group (BAG) - Standard response submitted by 684 individual stakeholders	Whole document & Policy ONR1: Green Belt	<p>[LDC NOTE - The following response has been prepared by the Burntwood Action Group and has been submitted by 684 individual stakeholders. Burntwood Action Group have also prepared a further representation submitted on behalf of the action group, this is representation reference LPRPO1047, 1089, 1104, 1105, 1106, 1107, 1108, 1109, 1110, 1111, 1112, 1113, 1114, 1115, 1116, 1117, 1118]</p> <p>Strongly object to one aspect of the document, namely the proposal in Strategic Policy ONR1: Green Belt to remove land off Coulter Lane from the Green Belt. I object most strongly to aspects of the Green Belt Review. Appalled there is no reference to the proposal to remove land from the Green Belt in the Burntwood section of the document. Government guidance states land should only be removed from the Green Belt in exceptional circumstances and I see nothing in the document to justify this. The proposal is in direct opposition to LDC's vision for Burntwood which states: "The high quality open spaces surrounding Burntwood will be enhanced and protected. These spaces will be seen by Burntwood communities as an asset that can be accessed playing an important role in contributing to their health and well-being". Walking and or cycling along Coulter Lane is enjoyed by many residents and views across this land are inspirational.</p> <p>For many years LDC has manipulated evidence to try to justify the removal of this land from the Green Belt. By its definition of terms and prejudice comments within the Green belt Reviews LDC has deliberately sought to minimise the value of this land to the Green Belt. The attempt to undermine the importance of these parcels began with the proposal in the Local Plan Strategy to remove the St Matthews Estate from the Green Belt. The estate had existed perfectly well in the Green Belt prior to its removal. Integration of this area with the town was the reason given and was a cynical way of making it easier for LDC to justify the removal of adjoining land from the Green Belt. Despite LDC's repeated assertion that previous Green Belt Reviews have been tested by inspectors I believe they are seriously prejudiced and should be removed from the evidence base.</p> <p>The most recent Green Belt Review tried to rectify one failing by accepting that Lichfield and Burntwood are large urban areas. However, LDC has tried through choice of questions and comments to undermine that decision. Throughout assessment the proximity of St Mathews estate is used to undermine the importance to the Green Belt of the parcel. The fact it is assessed as only of moderate importance in preventing sprawl is a travesty, it prevents the Sprawl of Burntwood and coalescence of the St Mathews estate.</p> <p>To suggest that assessments are "an independent, comprehensive and transparent assessment" is laughable. They are as prejudiced as previous reviews. LDC appear to have made no attempt to show there will be a necessity to 'safeguard land' around Burntwood and I can see no mention of 'exceptional circumstances'.</p> <p>Believe there is sufficient previously used land within Burntwood to accommodate all the housing needs for the natural population growth of Burntwood to and beyond 2040. Since the 1950s Burntwood has been used to house overspill from Birmingham and the Black Country. This has resulted in vast swathes of green land which once separated the villages being lost to housing. All green land which now surrounds Burntwood is needed for the health and wellbeing of its residents. The site off Coulter Lane helps to frame what is left of the ancient settlement of Burntwood.</p> <p>LDC needs to recognise the stupidity of the second sentence of the second paragraph of Local Policy B2. If development of such a site is allowed to take place the corridor will be broken and no off-site mitigation could bring it back. The land off Coulter Lane functions as such a site providing part of the corridor from Cannock Chase and Gentesahw Common to sites further to the south.</p> <p>If LDC continues with its plan to remove this site from the Green Belt it will eventually negate any efforts to achieve the following key issues for the district (identified in section 6.1 of the document); 8, 9, 11, 12, 13, 14, 15.</p> <p>Welcome Policy NS1: New Settlement. Such a settlement will be required to accommodate future growth arising from 4500 homes provided for Birmingham and Black Country overspill. LDC should start planning for it now so that it can be used to avoid any further erosion of the Green Belt surrounding Burntwood.</p>	<p>Comments noted. The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents. A component of the spatial strategy is the development of a new settlement within our district, so we can provide certainty to our communities and the development industry about how we intend to grow the district in the long term, this is policy NS1: New settlement.</p> <p>Green Belt Review is part of the evidence which supports the Local Plan. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.</p>
LPRPO32	Whittington Parish Council - D Walton	Whole document	<p>In the main the document appears to be a re-affirmation of the existing plan's ambitions including specific references to Whittington and Fisherwick. These should be viewed in the context of the Parish's adopted neighbourhood plan which sets out the community's preferences concerning the future pattern of development. One major change is the introduction of a strategic housing allocation in addition to the infill sites within the existing settlement boundary. The proposed site at Huddlesford Lane has now been reintroduced as part of the strategic housing allocation for the District. In common with other sites the Parish Council raised significant concerns previously. In particular we identified serious issues relating to access arrangements for the site. Nothing has changed so those comments are still valid and we ask that they are taken account of in this current evaluation. It is also suggested that serious consideration be given to adopting the Back Lane site instead of Huddlesford Lane, For reasons which remain unclear the site was discounted previously. The Parish Council would maintain it would be the least disruptive of all the sites.</p>	<p>Comments noted. A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location and detail of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.</p>

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO33	Alan Patterson	Chapter 19: Burntwood	To focus on town centre is misguided, there is no real need for a major town centre. Although I agree that there is no problem having some facilities like Library, Leisure centre etc. in one place, they are already. If retail at Sankey's is increased it will compete with Chasetown High Street and White Swan area, to their detriment. I do not see being able to attract retail players that would draw people from a wider area. Should be planning to improve all three areas.	Swan Island and Chasetwon are neighbourhood centres in the table in Strategic Policy OET2: Our Centres. OET2 and Policy B3 seek to protect and support their diversity to meet day to day local shopping services and facilities and supports initiatives that strengthen them so they remain viable.
LPRPO34	Alan Patterson	Policy ONR1: Green Belt	The removal of Green belt status from Coulter lane is a precursor to some future plan taking that land and allocating as suitable for housing use, this as wrong and unnecessary. Wrong in that your document refers a lots to the presence of Green Belt around Burntwood and the need to protect it and ensure that residents have it available, but at the same time you wish to remove some. Unnecessary because Brown field sites could be used for the eventual housing use, this would remove HGVs from residential roads and give better accommodation for local industry close to decent roads (by the ring road) All in all the stated aims of the plan, Town Centre notwithstanding, seem reasonable and honourable, but I do not see the removal of Green belt as being consistent with this aims.	The document identifies areas of 'Safeguarded Land' as defined within national policy. National policy states that consideration should be given that where changes to the Green Belt boundary are being proposed then areas of land between the urban area and the Green Belt (Safeguarded Land) should be identified to ensure the Green Belt boundary is capable of enduring beyond the plan period. The preferred options document identifies areas of such safeguarded land in conformity with national planning policy. The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO35	Alan Patterson	Policy B2: Burntwood environment	[Representation left blank]	Not applicable.
LPRPO36	Alan Patterson	Chapter 19: Burntwood	[Representation left blank]	Not applicable.
LPRPO37	Alan Patterson	Policy B1: Burntwood economy	[Representation left blank]	Not applicable.
LPRPO38	Alan Patterson	Policy B2: Burntwood environment	[Representation left blank]	Not applicable.
LPRPO39	Alan Patterson	Policy B3: Burntwood services and facilities	[Representation left blank]	Not applicable.
LPRPO40	Denise Burrows	Chapter 19: Our homes for the future	[Representation left blank]	Not applicable.
LPRPO41	Rhonda Shergold	Policy SHA2: Strategic housing allocation land west of Fazeley	Resident of Mile Oak opposes future development of Green Belt in Fazeley and Mile Oak due to the area already being under strain from HS2, residents of Sutton Road already enduring excessive road noise. 800 houses would bring approx. 800-1500 more vehicles into the area and have a negative effect onto the already congested A453. Noise of the development is too close to existing housing containing working professionals and children. There is already enough developments and boroughs already in the area as well as unsold properties. The traffic lights as Mile Oak suffer long queues of traffic daily, this will increase with more houses being built.	The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice. Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO42	Keleigh Wade	Policy SHA2: Strategic housing allocation land west of Fazeley	Completely against the decision to build 800 homes because the fields provide good dog walking fields and fields to meet people on walks. There isn't much greenery left around Tamworth as houses are being built everywhere. Not good for the environment as global warming is at its peak we don't need to add more houses to the devastation of that.	Policy SHA2 includes requirement for appropriate infrastructure, including access to green space as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review.
LPRPO43	Matt Walker	Policy SHA2: Strategic housing allocation land west of Fazeley	The development will be detrimental to the current quality of life, health and well-being for residents. Questions if any real consideration has been given to infrastructure. Main access to and from Sutton Coldfield, Lichfield and Tamworth the traffic is already difficult particularly at rush hour, this development will increase the number of vehicles by approx. 1600. Management of roadways is questionable based on shambolic traffic management at the Lady Bridge/ Jolly Sailor roundabout. Air pollution will increase and productivity in the local economy will plummet. Has any serious consideration been given to health in the form of local surgeries, hospital access and education? Doctors facilities are already inadequate in the area. Tamworth is already undersubscribed for primary schools, 800 homes would certainly justify its own nursery, primary and secondary school and this should be a priority of any new residential scheme.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO44	Peter Steventon	Chapter 19: Burntwood	Strongly opposes any safeguarding plans which have no validity considering the lack of use of brownfield sites which the 2013 plan identified. Infrastructure is at breaking point now to such a point the main road from Burntwood to Lichfield is incomplete and inability to provide further enhancements is a given.	The document identifies areas of 'Safeguarded Land' as defined within national policy. National policy states that consideration should be given that where changes to the Green Belt boundary are being proposed then areas of land between the urban area and the Green Belt (Safeguarded Land) should be identified to ensure the Green Belt boundary is capable of enduring beyond the plan period. The preferred options document identifies areas of such safeguarded land in conformity with national planning policy. The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO45	Peter Steventon	Chapter 19: Burntwood	Strongly agrees with the option presented by deputy to the Council at St Matthews Social Club no 10th January of the blue hoarding site near Sankey's Corner to be used for housing as no development of a town centre has happened in 45 years and is thus highly unlikely. Lichfield has its own blue board disaster to solve first and is and always will be the priority. Burntwood is second for everything.	A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.

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LPRPO46	Lauren Poole	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>Opposed to this proposal, no consideration of the residents or any of the long lasting effects it will have. With the amount of houses proposed other amenities will need to be added such as schools, shops and possibly a pub. All of which will have a massive effect on the local residents and how they live their lives.</p> <p>Sutton Road is already busy and at times can take up to 10 minutes to pull off the drive, the impact that the development would have on traffic would make living in the area impossible. Ambulances use the road as a direct route to Good Hope Hospital if plans go ahead this could cause issues with them being able to get to people and cause risk to life.</p> <p>If plans went ahead you would push people out of their homes. Bought the house because of the green land opposite.</p> <p>Adding a large estate to the area may also increase crime rates and anti-social behaviour as there will be a large increase in people which is worrying as a young family.</p>	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO47	Whittington Neighbourhood Group	Policy SHA4: Strategic housing allocation land of Huddlesford Lane	<p>The site is currently within the Green Belt and the proposal would remove it from there and place it within the envelope of the Parish to allow housing. The area is productive farmland outside of the Parish envelope. The inclusion of this runs contrary to the Neighbourhood Plan which has been adopted and goes against previous LDC policy. Huddlesford Lane is very narrow. it has a narrow bridge and is full of potholes. Traffic for the new development would use this as its a shorter to the A38 and Lichfield than going back through the village. The entrance to the proposed site is off Back Lane, this is already quite narrow, congested with parked vehicles and is already a bottleneck. Any new junction in this area would compromise parking. The proposal by Richborough to alter the pattern of the road junction would make things worse. Feel that the proposal to use the site for housing will create tremendous local opposition and objections. The site in Back Lane, previously in the SHLAA is much more preferable.</p> <p>The document is broad brush and taken at face-value says all the right things, however people need more detail and more information on where the priorities lie. For example you can't build more houses with out ensuring there's infrastructure. An integrated strategy with a list of priorities is what is needed. Is a further more detailed comments forthcoming?</p>	A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location and detail of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO48	Steven Hanstock	Chapter 19: Burntwood	The document is broad brush and taken at face-value says all the right things, however people need more detail and more information on where the priorities lie. For example you can't build more houses with out ensuring there's infrastructure. An integrated strategy with a list of priorities is what is needed. Is a further more detailed comments forthcoming?	The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO49	Borrowcop & District Residents Association	Chapter 13: Our homes for the future	A problem is that there have been and will be more windfall developments in and around the city that add substantially to the number of homes available, yet I understand they are not required toward the required total. This means the population will increase beyond the projection and will put even more pressure on services that are struggling to cope. All the apartments for the elderly that encircle the city will greatly exacerbate the problem as will developments to the south where no provision for health centres has been made.	All new dwellings completed within the plan period are monitored toward the local plan requirement. The document includes policies relating to infrastructure. The District Council will continue to engage with infrastructure providers to ensure appropriate infrastructure is provided.
LPRPO50	Borrowcop & District Residents Association	Chapter 14: Our economic growth, enterprise & tourism	It is bizarre that land on Eastern Avenue originally designated as business/industrial land is now being used for housing development whilst Green Belt land at Cricket Lane is to be built for such use. If such development is to go ahead it must be of proportions similar to the buildings near Wall Island and not to be distribution sheds like those on the A38 near Burton. The gateway site needs sympathetic development to give a good impression at this major entrance to the city and the sightlines and views from higher land to the north (Borrowcop area) should be protected. High tech, high status employment should be the aim, not logistics with 24 hour lorry movements next to the proposed housing development.	Comments noted. The Cricket Lane Strategic Development Allocation is allocated through the existing local plan.
LPRPO51	Steven Hanstock	Policy B1: Burntwood economy	Housing development within these 3 areas (B2, B3, SM6) will put major strain on the road infrastructure, schools, health, centres, transport and shopping area around Swan Island. Major costly work to create that infrastructure would have to be put in place before considering housing in these areas. The main concentration of such facilities in Sankey's Corner areas and surely thought must be given to locating housing there were there are 2 super markets, health centre, library, bus links, Chasewater. A reuse of the land behind Morrison's would be required. Sat between Lichfield and Cannock Burntwood doesn't need a huge shopping area. Remodelling the current shopping area including moving Salters Meadow Health Centre would provide growth and prosperity for the town.	The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO52	David Rathband	Whole document	Strongly object to one aspect of the document, the proposal in Strategic Policy ONR1: Green Belt to remove the land off Coulter Lane from the Green Belt. Church Road and Farewell Lane, which are likely to be distributor roads for any development in the Coulter Lane area, already suffer from traffic flows of over 300 vehicles per hour at peak times (Community Speed watch team). This results in dangerous traffic flows at the Rugeley Road end of Church Road every morning and afternoon in school term time. An additional 400 to 500 houses built in this area will almost certainly result in a tragic accident involving primary school children.	The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO53	Steven Hanstock	Policy B3: Burntwood services and facilities	Referring to the town centre, there is little if any entertainment facilities, especially for young people. Such facilities could include a small cinema (similar to the Red Carpet at Barton), youth club, skating rink, bowling alley, public house/restaurant etc. Such facilities would draw people to the town centre and create a vigorous identity.	The policy promotes the town centre as an area of increased and more diverse economic activity.
LPRPO54	Dave King	Chapter 19: Burntwood	Considers that the Green Belt status around Hammerwich needs strengthening. In the Green Belt Review parcels H1 to H7 dividing Burntwood and Hammerwich are now classified as moderate and developers will now use new classification as a pressure tool in seeking planning permission on Green Belt land. The pockets of Hammerwich Green Belt fit all the criteria and should be classified as important,	The comments relate to evidence the methodology for which was applied consistently across the district. The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO55	Lucy Oughton	Whole document	Dismayed to hear that LDC is trying to remove areas of Green Belt from local area. Have already had numerous developments in the area and local infrastructure and amenities can hardly cope with demand as it is. Developing this land would also cause more pollution and the wider impact upon wildlife and environment.	The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO56	Maureen Poyner	Policy SHA2: Strategic housing allocation land west of Fazeley	A further 800 homes on Green Belt land in Fazeley will change residents lives in terms of increased traffic, doctors appointments, schools and local hospital Robert Peel is not big enough to support extra people. Objects to any further houses being built until proper infrastructure is in place first.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO57	Michael Taylor	Policy SHA2: Strategic housing allocation land west of Fazeley	Objects to the proposal of 800 new houses at Mile Oak. Current infrastructure of schools, doctors and highways is already stretched to the limit and its difficult to understand how it will cope with the new proposals, in particular the traffic situation at Mile Oak is horrendous.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO58	Elena Falletta-Danan	Chapter 19: Burntwood	Disheartened to find that LDC have highlighted Green Belt land for development. The land behind Highfields Road provides a natural border between Brownhills and Chasetown/ Hammerwich, the same can be said for land between Hospital Road and Hammerwich. GPs surgeries and schools already struggle to meet the demands of the existing population. Destroying this area by making it one large conurbation is wrong, short-sighted and against the overall opinion of people living in the area. It is wrong for the Council to consider these plans as the Councils role is to act on behalf of the communities they serve. Reclassifying the stated of surrounding Green Belt is another attempt to push through plans for housing development.	The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO59	Mrs Jo Ives	Policy SHA2: Strategic housing allocation land west of Fazeley	I am a resident at Sutton road and I would like to view my concerns at the proposed building of 800 new homes at Mile oak In my opinion the Sutton Road is busy enough with the amount of traffic that already uses this road without cars from another 800 houses using it particularly in the rush hour. It is almost impossible to cross the road safely to use the bus stops and school children who need to cross the road at busy time find it very difficult and dangerous to get across. The road is a link for commuters to the M42,M6,M5 and the A38 and when there are problems with these roads (accidents or roadworks) we have a considerable amount of heavy lorries using the road as an alternative route. It is hard enough to get on and off your own drive now with lots of cars crossing the lights on red and the fact you should reverse on to your drive because it is dangerous to reverse off into the traffic Therefore I do not think the road can take anymore traffic.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO60	K Talbott	Policy SHA2: Strategic housing allocation land west of Fazeley	I have been informed that you are proposing / considering the idea of granting an application for 800 new homes (potentially 1600 more vehicles based on a two car family - not including older children who may have vehicles) on a green belt area - Sutton Road A453. As a resident of Mile Oak we are bitterly apposed to this idea. For over twenty years I have been a resident of Mile Oak. Over the last few years the traffic and population growth has become quite unbearable, there are certain times of the day that we do not like going out in our car, mainly due to the traffic around the Mercedes garage (right next to where 800 new homes are proposed) this is, in part due to Ventura shopping centre. The road from Ventura to Sutton Coldfield at certain times of the day is terrible and is often grid locked - the idea of placing another 800 homes on this route is a nightmare. It is very concerning that Lichfield District Council is even thinking of agreeing to the idea of putting 800 new on the edge of your boundary, this obviously doesn't affect Lichfield in any way- as we are joined or in some ways part of Tamworth, it is the local residents that will suffer the consequences. I suggest that the roads (or lack of them in the area) should be looked at first	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO61	C Jackson	Policy SHA2: Strategic housing allocation land west of Fazeley	Building on the greenbelt land at Mile oak would be an absolute disgrace. We understand that houses have to be built but they should be built on brownfield sites of which there are plenty about, not greenbelt which was put in place to protect the land. We hear on the news about food shortages after Brexit etc. so surely we need to keep our prime farmland in production. The area does NOT need this sort of development with all the increased traffic and infrastructure problems. We have also seen an increase in crime in the area over the years and this amount of houses will just compound this issue and increase crime levels even more. As a local resident who has lived here all my life, the building of this development will have a huge impact on the property we reside as it totally surrounds every aspect of my building therefore these proposals concern me greatly. We know these plans have been bought up in the past and Lichfield has honoured the green belt. Mile oak and its immediate area does not need or require this development. On a daily basis the road B5404 outside our property cannot cope with the amount of traffic now using it to get to either local businesses or Ventura and the A453 Sutton road is even worse. Put another 800 homes plus a school into the equation and this problem that already exists will increase ten fold let alone the pollution this will create. No formal notification of this development even though it directly concerns our property location. We like many we have spoken to regarding this are totally opposed to your preferred options development at Mile Oak.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO62	J and A Cheer	Policy INF1: Delivering our Infrastructure	No mention of additional NHS/GP facilities being provided.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO63	J and A Cheer	Policy OSC1: Securing sustainable development	The transport infrastructure should be based on electric buses and provision of fast / super-fast electric car charging points. This will help attain improved air quality targets.	Comments noted. The plan includes policies relating to transport and infrastructure and air quality.
LPRPO64	J and A Cheer	Chapter 12 Sustainable Transport & Policy LP1OST: Parking Provision	New housing should have to include the provision of kerb-side electric car-charging facilities where on-drive provision is not possible. Central government grants are currently available for converting some existing housing stock for kerb-side charging.	Comments noted. The plan includes policies relating to transport. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO65	J and A Cheer	Policy LC3: Lichfield services and facilities	The scope of the proposed new Leisure Centre is not explicit in it's actual provisions. Subsequent to the recent Friary Grange dispute over the potential closure of the swimming/exercise class facilities - the latest LDC comments have refused to guarantee to continue with the non-swimming provision when the new pool facility is built at some time in the ill-defined future. This does not accord with this LDC Plan 2040 aspirations to the health and life-styles of the future population profile in LDC.	Comments noted. The preferred options document includes policies relating to leisure provision. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers and review evidence through the local plan review process.
LPRPO66	J and J Stringer	Chapter 19: Burntwood	Whilst there is a need for a few more houses, I would like you would be taking on board the broader aspects of the environment we all live in. Recently we were all asked to consider the environment - plant more trees/forests; the land is very important ; we need to consider the land itself, and the need to produce our own food, our carbon footprint. All these issues need to take a priority otherwise there would be no need for houses and losing our resources.	Comments noted. The preferred options document includes policies across a range of themes including in relation to the environment. A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO67	Angela Protheroe	Whole document	The junction at Mile Oak is very badly congested at peak times, back to Gainsborough Drive and back along Bonehill Road to the bridge over the canal. The junction requires reconfiguration anyway with possibly a right turn filter into Watling Street but with possibly 1600 extra vehicles in the area from this development. Further to this the extra population would create enormous pressure on GP surgeries. I understand that 11 Fazeley Town Councillors object to the proposal. I stand behind their objections, in particular the incursion into the Green Belt. There will be considerable disruption during the construction phase.	The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice. Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO68	Gordon Williamson	Whole document	Please find my objections to the proposed development of Sutton Road Mile Oak. 1) It is not a suitable location. Development in this location is too far from the main area of facilities and services for the settlement in Fazeley. Residents would not be able to easily walk or cycle to the site. Strategic developments need to be located near train stations. 2) It will worsen existing traffic congestion. The proposal could result in another 800-2400 cars on the road plus more delivery vehicles. 3) Impact on Tamworth. New strategic developments should be located closer to Lichfield not Tamworth. 4) Loss of Green Belt. Green Belt should only be used in exceptional circumstances, brownfield land and greenfield sites should be used for development first before green belt. 5) It will not improve the existing communities of Mile Oak, Bonehill and Fazeley SHA2 would not improve the quality of life of local residents. 6) The size of the proposed development is disproportionate to the size of the existing community. 7) Loss of countryside and negative impact on wildlife, biodiversity and landscape. 8) Hints Road outside the Mercedes dealership is at the moment used as an car park. HGV's use this road to access MOT facilities. Mile Oak is already an area with high light pollution; an additional 800 homes would increase light pollution and have a negative impact on wildlife.	The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice. Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO69	Gordon Williamson	Whole document	<p>[LDC Note - Duplicate representation submitted - Duplicate of representation ref: LPRPO68]</p> <p>Please find my objections to the proposed development of Sutton Road Mile Oak. 1) It is not a suitable location. Development in this location is too far from the main area of facilities and services for the settlement in Fazeley. Residents would not be able to easily walk or cycle to the site. Strategic developments need to be located near train stations. 2) It will worsen existing traffic congestion. The proposal could result in another 800-2400 cars on the road plus more delivery vehicles. 3) Impact on Tamworth. New strategic developments should be located closer to Lichfield not Tamworth. 4) Loss of Green Belt. Green Belt should only be used in exceptional circumstances, brownfield land and greenfield sites should be used for development first before green belt. 5) It will not improve the existing communities of Mile Oak, Bonehill and Fazeley SHA2 would not improve the quality of life of local residents. 6) The size of the proposed development is disproportionate to the size of the existing community. 7) Loss of countryside and negative impact on wildlife, biodiversity and landscape. 8) Hints Road outside the Mercedes dealership is at the moment used as an car park. HGV's use this road to access MOT facilities. Mile Oak is already an area with high light pollution; an additional 800 homes would increase light pollution and have a negative impact on wildlife.</p>	<p>[LDC Note - Duplicate representation submitted - Duplicate of representation ref: LPRPO68]The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.</p> <p>Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.</p>
LPRPO70	Victor de Costa	Whole document	Would like the Hammerwich Greenbelt Areas HM1-7 to be reclassified as important, as they form the natural separation between Hammerwich and Burntwood	The comments relate to evidence the methodology for which was applied consistently across the district.
LPRPO71	Sharon Beardsmore	Whole document	Doesn't agree with the status change of the Greenbelt parcels HM1-7 to 'moderate' which gives opportunities to developers. It should be reclassified as important as they form natural separation between Hammerwich and Burntwood	The comments relate to evidence the methodology for which was applied consistently across the district.
LPRPO72	Annie Bishop- Shakespeare	Policy SHA2: Strategic housing allocation land west of Fazeley	Understands the importance of new housing due to the shortage of new homes but impact on the area should be reconsidered, as traffic is already terrible. Ventura Park Retail Centre is a nightmare already with parking at a premium. As soon as Drayton Manor starts getting visitors, locals wont go out in their cars till after 11:30am, so doctor/hospital/dentist appointments have to be scheduled accordingly. Patients of Fazeley doctors surgery arrive fraught and anxious after being stuck in local traffic late for their appointments.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO73	Jeff Hateley	Policy SHA2: Strategic housing allocation land west of Fazeley	The vision for Fazeley is laudable however, I disagree that Policy SHA2 will achieve this for the following reasons - firstly SHA2 will destroy acres of countryside and remove green space in the community. Secondly it will not lead to an improved level of open space it will reduce it. Thirdly, the additional traffic from residents will increase pollution and make the area less attractive. I disagree that SHA2 would improve transport links as due to its isolated location at the far end of the settlement, most journeys would be made by cars. I totally object to provision being made for 924 new dwellings, 124 through existing commitments and 800 as part of a strategic allocation located to the south west of Mile Oak junction. The size of SHA2 is totally disproportionate for the size of the existing community. There are approximately 1900 households in the Fazeley ward so an additional 800 houses would represent an increase of 30% and 924 an increase of 33%, I have not seen any evidence in your documents on local housing needs to justify a strategic development of this size.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. A housing and economic development needs assessment (HEDNA) has been prepared as part of the evidence base which supports the Local Plan Review.
LPRPO74	Jeff Hateley	Policy F3: Fazeley economy	924 new homes is not sustainable for the size of the settlement and the infrastructure that is in place or could be delivered without worsening the environment and quality of life for existing residents. SHA2 is too far from Fazeley centre for new residents in the proposed location to shop and benefit the economy there; it is too far for residents to easily walk or cycle and there is nowhere to park other than limited street parking. The majority of new residents in SHA2 would travel to Ventura in Tamworth (or further afield in Birmingham) aiding their economies. The whole concept of promoting significant growth to aid the regeneration of Fazeley is totally contradictory, and growth of this size will not benefit the economy in Fazeley ward as advocated in this document.	Comments noted.
LPRPO75	Ruth Cooper	Policy OR1: Small rural villages and our wider rural areas	This clause is ignored in the proposals I have seen for land between Hospital Road and Norton Lane to be a possible site for 1300 homes and associated facilities. This would lead to the destruction of Hammerwich as a village by linking it to the Burntwood conurbation. I note that this clause states that the character of such settlements should not be compromised.	The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO76	Hugh Ashton	Whole document	The plan talks about attracting high quality employment. We agree with this but feel further consideration that further land is allocated for the businesses providing these types of employment. Some of the land allocated for employment purposes will be for SME/start-up businesses for example Cricket Lane. We know there are two large employers within the city (Police Mutual and LDC) and if we attract two or three more this would be game changing. This also links to the Lichfield City neighbourhood plan. We know that leisure is underprovided in Lichfield, LDC has committed to provide a new leisure centre in five years time. Land options for this should be within this local plan and specific refer to LDC's commitment to build the centre. Document identifies a lack of public infrastructure as the population including GP's and secondary schools. Land for these needs to be allocated. 40% affordable housing target is aspirational, need a minimum requirement which we suggest should be 35%. The city needs to provide sufficient EV charging points.	The Local Plan Review will seek to allocate sufficient land to meet the employment requirements set out within policy. The Local Plan Review includes policies on infrastructure provision which includes leisure centres, schools and GP services and will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO77	Jeff Hateley	Policy F1: Fazeley environment	I disagree with the wording of Policy F1 as I do not think further coalescence within the settlement would dilute the character of the existing communities. Allowing some housing development on smaller sites along the B5404 could aid the appearance of the area and its regeneration. I do not see how it is possible to improve the linkages between the communities without some coalescence. The Local Plan should be about creating a better sense of place as promoted by the Council's draft strategic plan and I do not see how SHA2 would do this. Regeneration of Fazeley would be welcomed where the following is needed - fire damages building opposite Drayton Manor cricket club brought back into use or demolished. Consideration of parking that isn't on street parking. Improvements to the recreation ground at Mile Oak community centre and land rear Victory Terrace.	Comments noted. The Preferred Options includes policies which seek to encourage the regeneration of Fazeley.

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LPRPO78	Jeff Hateley	Policy F2: Fazeley services and facilities	Agree that improvements should be made to the existing provision of open space to meet the needs of the community- this should be at open space at Mile Oak community centre and at the rear of Victory Terrace (Atherstone street) in Fazeley. Greater access should be promoted to the canal network, especially via Bonehill where access to the canal is not signposted and it's overgrown in places. 20.28 states that 'it is important to safeguard and promote cohesion within the resident communities' so why is SHA2 being proposed that would have the opposite effect and only dilute any further cohesion or connection between them?	Comments noted.
LPRPO79	Jeff Hateley	Picture 20.1 & Policy SHA2: Strategic housing allocation land west of Fazeley	Object to Policy SHA2 and the proposed allocation for the following reasons: a) It will not improve the existing communities, the proposal will worsen the quality of life of existing residents. SHA2 will create a new community that would not integrate with Mile Oak, Bonehill and Fazeley and would not improve the lives of existing residents. It is too far from facilities and services that are nearly two miles away. B) It is not in a safe or suitable location for the settlement. It is too far from the main area of facilities and services and residents would not be able to easily walk or cycle from it to anywhere. Its not a safe location to allow children to cross the A453. Large developments need to be located near to rail stations. Tamworth train station is 3 miles away which no one will realistically walk to. Evidence in support this is included in the 2011 rural master planning project. C) it will worsen traffic congestion. The road system cannot cope as it is without then addition of more vehicles owned by residents of another 800 homes plus the 750 homes being built at Dunstall Park in Tamworth Borough. D) The impact of the development will be on Tamworth Borough. New strategic developments should be closer to Lichfield. E) The loss of Green Belt. Green Belt should only be used in exceptional circumstances. I do not consider that exceptional circumstances exist. There is no evidence to justify all of SHA2 being released from the Green belt. G)The proposed size of SHA2 is disproportionate to the size of the existing community.	Comments noted. Policy SHA2 includes requirement for appropriate infrastructure as part of the development of the site. The Green Belt Review is part of the overall evidence base which underpins the local plan. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.
LPRPO80	Jeff Hateley	Policy ONR1: Green Belt	Object to greenbelt release at Mile Oak SHA2. The Greenbelt Review 2019 did not assess the whole of site SHA2, only a smaller parcel of land FZ1. Its release from the greenbelt is therefore not based on evidence.	The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice. Comments noted. The Green Belt Review provides a comprehensive strategic assessment of all parts of the green belt.
LPRPO81	Elliot Smith	Policy B2: Burntwood environment	I believe that the plan to remove land from the Green Belt around Burntwood is unnecessary and that there are no extreme circumstances that require the removal of this land from the Green Belt. The Coulter Lane Green belt removal would join St Matthews up to the main part of Burntwood and will remove this unique selling point from the area. If there are to be 400 dwellings required then this should be allocated to the area currently marked as 'Town Centre' Designation. This space will suffice for the 400 dwellings required and would remove the need to take Coulter Lane out of the Green Belt. Lichfield should concentrate on reigniting the Friarsgate development in Lichfield. Any additional traffic in Burntwood could create severe safety risks.	The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO82	Adrian Scattergood	Whole Document & Policy ONR1: Green Belt	Strongly object to one aspect of the document, the proposal in Strategic Policy ONR1: Green Belt to remove the land off Coulter Lane from the Green Belt. Strongly disagree with elements of the Sustainability Appraisals and recent Green Belt reviews referencing Burntwood, as they are unsound. Growth can be a good thing, but sprawl is definitely not. Management of "smart growth" needs to happen by intensively regenerating existing neighbourhoods within Burntwood and, therefore, preventing the damage to Burntwood's boundaries. Insufficient proof that every step possible has been taken to accommodate future growth without removing land from the Green Belt. It is the council's responsibility to check themselves, and not cave in to the greed of developers and land owners., see Para 137 NPPF. Burntwood is NOT sustainable for any such sprawl. No changes to the sustainability of Burntwood has taken place and this has not been addressed in any subsequent Sustainability Appraisals since 2013, including those within this recent review...As noted by inspectors at examinations; " Burntwood should consider the relevance of the Green Belt to the important issues of the outward sprawl of its large built-up area and the regeneration of the town and "the current boundaries of the Green Belt are fundamental to its purpose" and "Safeguarding land from the Green Belt would be appropriate for Burntwood, only once the settlement has achieved a greater sustainability to a point at which it could accommodate such growth." A release of Brownfield sites within Burntwood, combined with adequate investment in to the infrastructure is desperately required and makes for the smart management of short term growth for the town. It is crucial that we make what we have work better. Surely an inspector will see that removing just a few parcels of land from Green Belt will have little long term benefit. There is not enough evidence of "exceptional circumstances" to justify the removal of any land from Green belt around Burntwood. However, I do support the proposal of a new settlement (Preferred Policy NS1: New Settlement) to accommodate the large number of house building being pushed our way from Birmingham. LDC should investigate and implement fully an appropriate plan to take this proposal forward. This will accommodate a sensible and sustainable option for long term growth.	The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process. A component of the spatial strategy is the development of a new settlement within our district, so we can provide certainty to our communities and the development industry about how we intend to grow the district in the long term, this is policy NS1: New settlement.

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LPRPO83	Ian Colclough (Kings Bromley Parish Council)	Policy KB1: Kings Bromley Environment	Overall the Parish Council is supportive of the comments made in the Review but would add the following comments: "Kings Bromley should remain a freestanding settlement with well-defined boundaries". Housing development should be contained within these boundaries and should be built to meet local needs. This should include a balance of lower cost housing to encourage youngsters and key service employees to stay in the village and maintain a balanced age profile. "Support will be given to initiatives to curb the negative impact of the A515/ A513 particularly with regard to HGV and speed restriction measures" This should include the early upgrading of Wood End Lane and reclassification to an 'A' road and declassification of the A513 through Kings Bromley village. Support should also be given to Hilliard's Cross junction particularly for traffic travelling North. Kings Bromley Parish Council would want dialogue concerning the Staffordshire Minerals Local Plan and the District Council to ensure the village is adequately protected should there be a requirement to use the land identified as an area for search for sand and gravel. 'Support the development of public footpaths and cycle-ways linking up with others in the District to add amenity value. Also to retain and enhance public transport which will reduce the risk of isolationism, particularly in an ageing population. ' It is the intention of Kings Bromley Parish Council to develop a Neighbourhood Plan.	Comments noted.
LPRPO84	Adrian Scattergood	Policy NS1: New settlement	Support the proposal of a new settlement (Preferred Policy NS1: New Settlement) to accommodate the large number of house building being pushed our way from Birmingham. LDC should investigate and implement fully an appropriate plan to take this proposal forward. This will accommodate a sensible and sustainable option for long term growth.	Support noted.
LPRPO85	Debbie Scattergood	Policy NS1: New settlement	Support the proposal of a new settlement to accommodate the large number of house building being pushed our way from Birmingham.	Support noted.
LPRPO86	June Watson	Whole document	If the field behind Highfields Road is changed it will mean no boundary between Staffordshire and West Midlands expanding the urban sprawl even more. Objects to the proposed changes to the Greenbelt Strategy for Hammerwich, Burntwood and Chasetown area. Why is the Greenbelt Strategy being changed when it has been recently agreed. Nothing has been changed to address our concerns for the area. No extra doctors surgeries, no improvement to road infrastructure or road surfaces, no extra schools. The two high schools are over subscribed. There is a stream that runs through the agreed Greenbelt Strategy off Highfields Road ad is needed to help control the water levels in the canals and Chasewater. If houses get allowed to be built on this field it will get worse as drainage for new homes never seems fit for purpose.	The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO87	Debbie Scattergood	Policy ONR1: Green Belt	Strongly object to the land situated off Coulter Lane (B2 and SM6) should be removed from the Green Belt. For many decades Burntwood has been used as a "housing hinterland" to Birmingham, which has eroded our Green fields and the identities of our historic villages. The need to keep the urban boundary/ Green Belt boundaries fixed and without further adjustment is crucial to the future of Burntwood. Growth can be a good thing , but sprawl is definitely not. Management of "smart growth" needs to happen by intensively regenerating existing neighbourhoods within Burntwood and, therefore, preventing the investment into land-gobbling , congestion generating and environmentally damaging extensions to Burntwood's boundaries. Burntwood is NOT sustainable for any such sprawl from the building of new developments. The Sustainability Appraisal 2013 reached exactly that conclusion. No changes to the sustainability of Burntwood has taken place since, and this has not been addressed in any subsequent Sustainability Appraisals since 2013. A release of Brown field sites within Burntwood , combined with adequate investment in to the infrastructure is desperately required and makes for the smart management of growth. It is crucial that we make what we have work better and give Burntwood back a pulse! There is no evidence of "exceptional circumstances" to justify the removal of any land from Green Belt around Burntwood.	The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process. The document identifies areas of 'Safeguarded Land' as defined within national policy. National policy states that consideration should be given that where changes to the Green Belt boundary are being proposed then areas of land between the urban area and the Green Belt (Safeguarded Land) should be identified to ensure the Green Belt boundary is capable of enduring beyond the plan period. The preferred options document identifies areas of such safeguarded land in conformity with national planning policy.
LPRPO88	Diane Rowley	Policy B2: Burntwood environment	Evidence provided on the potential for archaeology and early settlements around Burntwood. Recommend full independent investigation of the land for early settlements be undertaken so not destroyed.	Comments are noted. Policies within the our built and historic environment section safeguard the historic environment which includes archaeology (discovered and undiscovered) within the District.
LPRPO89	Mark Stinson	Policy SHA2: Strategic housing allocation land west of Fazeley	Objects to proposed plans to allocate green belt land on the Sutton Road for the provision of additional housing. Traffic on Sutton Road is already heavily congested especially at rush hour. Traffic congestion should be improved with additional road infrastructure. before any land is allocated. Challenges LDC to examine road and pavement surfaces before spending Council Tax on new homes. There is also constant flooding on Plantation Lane.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.

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LPRPO90	P Knight	Policy SHA2: Strategic housing allocation land west of Fazeley	The area proposed was purchased by the local residents of Mile Oak back in the 1970 for both a new football pitch and centre for the Mike Oak Rovers football team as well as for the local citizens of Mile Oak. As far as we are all aware it still belongs to the local citizens and Mile Oak Rovers football Club. The area of land in question is the area opposite French Ave at the Sutton road end. In addition, I oppose the development for a number of other reasons which relate to the negative impact it would have on the residents of Mile Oak, Bonehill and Fazeley. Their is existing congestion and the road system is overfilled. It will put people off visiting for shopping and tourism. Short-sightedness and with no concerns for the locals of Mike Oak that already have to put up with long delays in getting out of their roads which lead onto the Sutton road.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO91	Jane Stinson	Policy SHA2: Strategic housing allocation land west of Fazeley	Objects to building in the Green Belt in Mile Oak. Area is already heavily populated and suffers with traffic congestion. Residents purchased properties in the area for its semi-rural appeal and relative seclusion, we bought our home 4 years ago for this reason and the tranquil setting and Green Belt status. Poor repair of roads and footpaths in Bonehill should be addressed first. Need to get the basics right before damaging countryside and Green Belt areas. Sure there is more suitable areas in Lichfield and Tamworth that could be considered first.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.
LPRPO92	Scott Banks	Picture 20.1 & Policy SHA2: Strategic housing allocation land west of Fazeley	I cannot support the planned development at Mile Oak for the following reasons: 1) The increased traffic will be too severe. Traffic generated will overburden the already Stretched Sutton Road. The traffic will be in addition to the new homes near the Brakes factory. Added traffic will increase air pollution. 2) Development does not actually serve Fazeley, it is in Mile Oak which has a woeful lack of local amenities. 3) Connection to local services is hampered by the location of the development on a cross roads which cannot be expanded. 4) There is a lack of schools within the Tamworth area with over subscription at many. There is no suggestion of making this development self serving. 5) What consultation has been had with Sutton Coldfield Council? Realistically the site is desirable for those who cannot afford to live in Sutton, what provisions would be put into place if built to ensure it benefited Tamworth residents? 6) Building on Green Belt should only be in exceptional circumstances. Mile Oak community already suffers from a lack of accessible green space (again the use of a car is needed to easily access other green space within the town centre.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.
LPRPO93	T Bunn	Policy SHA2: Strategic housing allocation land west of Fazeley	Object as: It's not in a suitable location. Development in this location is too far from the main area of facilities and services for the settlement in Fazeley. Residents won't not be able to easily walk or cycle from the site to anywhere, particularly at rush hour. Large strategic developments need to be located nearer to train stations. The closest train station is 3 miles away which most people would travel to by car adding to traffic congestion. It will worsen existing traffic congestion. The current road system is currently congested without the addition of more cars from residents of another 800 homes. There are also 750 homes being built at Dunstall Park near Ventura which will make the traffic worse at Mile Oak. This proposal could result in another 800-2400 cars on the road plus more delivery vehicles. The A453 is already heavily congested at Mile Oak traffic lights, on the A453 between Tamworth and Mile Oak and along the Sutton road. At rush hour it's often gridlocked to Ventura. The HS2 construction site is also on the A453 which will further add to congestion. Impact on Tamworth. New large strategic developments should be located closer to Lichfield, not Tamworth. Development of the site would create a new community of around 1600- 2400 people with between 300 and 600 children. This new community would require primary schools, secondary school, support services, doctors, clinics, leisure facilities and utilities. Most of this provision will fall to Tamworth Borough not Lichfield District which is not accessible. Loss of Green Belt. Green Belt should only be used in exceptional circumstances; brownfield land and greenfield sites should be used for development first before greenbelt. There is not the evidence to justify all of SHA2 being released from the Green Belt- the Greenbelt Review 2019 only assessed a third of the site (FZ1). It will not improve the existing communities of Mile Oak, Bonehill and Fazeley SHA2 would not improve the quality of life of local residents. It would create a new community which would only burden local amenities and not improve Mile Oak, Bonehill or Fazeley. The size of the proposed development is disproportionate to the size of the existing community. Loss of countryside and negative impact on wildlife, biodiversity and landscape There is a need to protect the countryside and SHA2 would have a negative impact on wildlife and biodiversity, particularly along Bourne Brook. Mile Oak is already an area with high light pollution; an additional 800 homes would increase light pollution that would have a negative impact on wildlife. On your own 2011 report, this area was recognised as unsuitable for development.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. Policy ONR2 seeks to deliver biodiversity net gain from the development so there would be no impact upon wildlife. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.

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LPRPO94	Michael Swinburn	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>The proposed plans for new homes in the Greenbelt at Mile Oak is the most significant piece of Greenbelt we have and is highly valued by everyone. The Greenbelt Review 2019 only assessed Parcel FZ1 which is approx. a third of SHA2, so the remaining two thirds of the sites are unassessed. If this land becomes covered by houses, life for local residents will become intolerable for local residents with the increase in traffic on an already overcrowded road.</p> <p>It is the only recreational land residents can access without the use of a car. The effect it will have on protected species, air pollution, pressure on local services and the difficulty for residents to get onto the Sutton Road are of grave concern.</p> <p>Consideration should also be given for the 700+ houses already being built on the Tamworth Lichfield border at Dunstall Park.</p>	<p>Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.</p> <p>Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice. The Green Belt Review provides a comprehensive strategic assessment of all parts of the green belt.</p>
LPRPO95	Theatres Trust - Tom Clarke	Policy OHSC2: Arts and culture	The Trust welcomes this policy which provides support and protection to Lichfield's valued arts and cultural facilities such as the Garrick Theatre in line with paragraph 92 of the NPPF.	Support noted.
LPRPO96	M Kinson	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>Strong objections for environmental reasons, when people are passionate about preserving green space, I object to building on green belt, especially on such a large scale when brown areas are available. It is detrimental to this area and local community but has no impact on Lichfield. Together with the 124 dwellings in Dunstall Park, the volume of traffic on the already congested roads and the traffic pollution increase will be considerable for the residents already living here.</p>	<p>Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.</p> <p>Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.</p>
LPRPO97	Jill Patterson	Whole document	<p>Strongly objects to the removal of land off Coulter Lane and St Matthew from the Greenbelt.</p> <p>There are no exceptional circumstances for down grading our precious Greenbelt and we should not let profit driven land owners or builders dictate this.</p> <p>There are brownfield sites which could accommodate housing developments.</p> <p>Any town centre redevelopment should be concentrated on the Swan Island at Burntwood, High Street at Chasetown and Sankey's Corner at Chase Terrace thus providing for all 3 communities instead of trying to create another location.</p> <p>The industrial sites at Mount and New Road are badly situated and are no longer fit for purpose, the purpose built Business park by the bypass seems the most sensible option thus freeing up more brownfield sites for housing development,.</p>	The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO98	Susan Foster	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>Object. Understand the need for new houses but brownfield sites are available. I would hate to think you weren't encouraging the use of brown sites due to cost involved and developers wanting to make as much money as possible? The strain all the extra cars will put on the road and surrounding areas especially Tamworth. Doctor's surgeries are already strained and waiting lists for appointments can be two weeks minimum. We live in Bonehill and believe this development will be detrimental to residents. Please refrain from the desecration of more green belt land. We need to hold these areas dear for future generations, for wildlife and for people's general good health.</p>	<p>Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. Agree policies within the plan safeguard opens space, biodiversity net gain green belt however the loss of Green Belt is justified through the evidence. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.</p> <p>Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.</p>
LPRPO99	Roger and Tracy Taylor	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>Strongly oppose as would have a detrimental effect on local area and the residents. No impact upon Lichfield and create numerous problems and traffic chaos for Tamworth. There is uncertainty and potential traffic impact from HS2 and the road is prone to heavy traffic congestion. Additional development will compound the problem. Area prone to traffic congestion especially when problems occur on the local motorways. Concern at safety of access to roads given the volume of traffic. Current infrastructure insufficient, local amenities are barely sufficient to serve current populations. Local shopping facilities at Ventura are very busy already, not only with local residents but people and traffic from further afield. More houses are already proposed at County Drive and Dunstall Park. The proposal is not sustainable for the locality or fair on existing residents. Concerned about the adverse effect on the local environment and loss of wildlife habitat and reduction in air quality and increase in air pollution worsening existing health condition. Why is Green Belt being considered when surely there are alternative brown field sites available. This Green Belt is very beautiful and a welcome contrast to the already developed areas close by.</p>	<p>Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy's noted.</p> <p>Policy SHA2 includes requirement for appropriate infrastructure as part of the development of the site. Policies within the plan safeguard open space, biodiversity net gain, green belt, air quality. The loss of Green Belt is justified through the evidence. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.</p> <p>Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.</p>
LPRPO100	Marea Savage	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>Opposes the proposal in Mile Oak for 4 reasons:</p> <p>Traffic is a problem with Drayton Manor, Ventura and on average every household has two cars.</p> <p>Will there be new nursery, primary and secondary schools?</p> <p>Hospitals are already at a saturation with a large area to cover for consultants. Sir Robert Peel has nowhere near enough the facilities needed.</p> <p>Doctors surgeries, recruiting new doctors will be difficult as there is a national problem.</p>	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.

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LPRPO101	Julie Broderick	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>Opposes the building of 800 homes on Green Belt land in Mile Oak. Volume of traffic between Mile Oak and Fazeley already causes problems for the residents.</p> <p>Loss of wildlife would be detrimental and air pollution would be significantly higher. The area is already overcrowded and we do not want more houses.</p>	<p>Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.</p> <p>Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.</p>
LPRPO102	AP and NC Smith	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>This site is ill considered. Climate change: There is the bare minimum of public transport with no direct access to public services and everyone will need at least one if not 2 cars. Danger - Roads are all busy main roads. Roads - road system is inadequate, no links to Lichfield, no access to bus or train services, no alternative to the private car. Access to Tamworth and Birmingham is already problematic- A453/A5/A38 is overloaded and travel to M42 is gridlocked, holdups on A5/Toll/A38 junction. Proposal will create a large development dependant on road transport with no alternative travel options. Will create huge increase in demand for Doctors, hospital, primary and secondary schools. Shopping facilities - Ventura is heavily committed serving the local population and visitors from outside the area which creates traffic movements on A453. Development creates pressure on the facilities in Tamworth, there is other land available nearer Lichfield City which can be properly served by the facilities of Lichfield City and environs. Should reconsider the location and size of this proposal.</p>	<p>Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.</p>
LPRPO103	Julie Gould	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>Objects to the proposed development in Fazeley due to: the destruction of green spaces and the flora and fauna contained within it, Greenbelt should be protected to maintain rural heritage, addition of more concrete and tarmac covered land will add to flooding of the area, current transport links are at the limit at peak times - 800 dwellings will exacerbate the situation. Hospital has limited facilities, improve services and faculties that are already present before adding more houses.</p> <p>Areas such as Tolsons Mill and Bonehill Mews would be prime locations for future developments with careful consideration given to the infrastructure of the local area.</p> <p>Objects to the proposed development of 102 homes at Tolsons Mill as it will have a major impact on the local area, road system already struggles with seasonal traffic from Drayton Manor.</p>	<p>Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.</p> <p>Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.</p>
LPRPO104	Julie Gould	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>Objects to the proposal of 7 dwellings behind 14 The Green, Bonehill. Land is adjacent to a conservation area and building will have a detrimental effect on the ecology. Trees and historic assets need protecting. Bonehill is a hamlet and does not have the infrastructure to accommodate further development, the roads would not cope with construction traffic. Drainage is poor in the area, covering land with buildings and tarmac will only to these issues.</p>	<p>The site referred to does not form part of an allocation in this plan. Policies within this plan support the safeguarding and protection of ecology and historic assets.</p>
LPRPO105	Ben Scattergood	Whole document and Policy ONR1: Green Belt	<p>Strongly object to one aspect of the document, the proposal in Strategic Policy ONR1: Green Belt to remove the land off Coulter Lane from the Green Belt. Strongly disagree with elements of the Sustainability Appraisals and recent Green Belt reviews referencing Burntwood, as they are unsound. Growth can be a good thing, but sprawl is definitely not. Management of "smart growth" needs to happen by intensively regenerating existing neighbourhoods within Burntwood and, therefore, preventing the damage to Burntwood's boundaries. Insufficient proof that every step possible has been taken to accommodate future growth without removing land from the Green Belt. It is the councils responsibility to check themselves, and not cave in to the greed of developers and land owners., see Para 137 NPPF. Burntwood is NOT sustainable for any such sprawl. No changes to the sustainability of Burntwood has taken place and this has not been addressed in any subsequent Sustainability Appraisals since 2013, including those within this recent review...As noted by inspectors at examinations;</p> <p>" Burntwood should consider the relevance of the Green Belt to the important issues of the outward sprawl of its large built-up area and the regeneration of the town and "the current boundaries of the Green Belt are fundamental to its purpose" and "Safeguarding land from the Green Belt would be appropriate for Burntwood, only once the settlement has achieved a greater sustainability to a point at which it could accommodate such growth." A release of Brownfield sites within Burntwood, combined with adequate investment in to the infrastructure is desperately required and makes for the smart management of short term growth for the town.</p> <p>It is crucial that we make what we have work better. Surely an inspector will see that removing just a few parcels of land from Green Belt will have little long term benefit. There is not enough evidence of "exceptional circumstances" to justify the removal of any land from Green belt around Burntwood. However, I do support the proposal of a new settlement (Preferred Policy NS1: New Settlement) to accommodate the large number of house building being pushed our way from Birmingham. LDC should investigate and implement fully an appropriate plan to take this proposal forward. This will accommodate a sensible and sustainable option for long term growth.</p>	<p>The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process. A component of the spatial strategy is the development of a new settlement within our district, so we can provide certainty to our communities and the development industry about how we intend to grow the district in the long term, this is policy NS1: New settlement.</p>
LPRPO106	Ben Scattergood	Policy NS1: New settlement	<p>Support the proposal of a new settlement (Preferred Policy NS1: New Settlement) to accommodate the large number of house building being pushed our way from Birmingham. LDC should investigate and implement fully an appropriate plan to take this proposal forward. This will accommodate a sensible and sustainable option for long term growth.</p>	<p>Support noted.</p>

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LPRPO107	Neil McWalter	Policy ONR1: Green Belt	<p>Strong objection to removal from the Green Belt and building 400 houses being built on the proposed site.</p> <ol style="list-style-type: none"> 1. Increased traffic density which Burntwood and the surrounding roads cannot accommodate 2. Insufficient schools for the existing community, (& certainly insufficient for another 400 houses) 3. Insufficient doctors, dentists and other healthcare provisions for the existing community (& certainly insufficient for another 400 houses) 4. Insufficient police, & fire coverage 5. Ample alternative brown field land already available for house building in the locale towards Chase Terrace, adjoining Gentleshaw Common, & adjacent to Bradshaw's butchers. 6. The loss of this site from Burntwood's Green Belt further destroys the rural location & setting of the historical Burntwood 7. Furthermore, the council have not made a credible case for the so called 'exceptional circumstances' for the removal of this land from the Green Belt. 	Comments noted. The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO108	Mike Wilson	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>There is more than enough local traffic problems already and these are added to by the close proximity of Drayton Manor Park and the Ventura retail facility both of which draw significant visitors from outside the local area. In my view the plan to "dump" 800 houses to satisfy a "quota" for Lichfield as close as possible to the border between Lichfield and Tamworth is ill conceived, one might say disingenuous. Building programmes in Tamworth at Dunstall Park will cause more overstretch on already overloaded infrastructure. This proposal will make it even worse but with minimal impact on Lichfield.</p> <p>This plan will the impact the following:</p> <ul style="list-style-type: none"> • Access to and added congestion to an already overloaded road system into and around Tamworth. Current trends suggest 800 houses will equal about 1600 cars. Come and look at how many we have in our relatively small estate. • An extra influx into our schools. • A greater strain on health care facilities. • Adding even more to the linear nature of Fazeley along Watling St. • Proximity to the route of HS2. • Greater strain on the accessibility of Ventura Park which is currently already overstretched. • The reliability of local bus services due to extra traffic flow. 	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO109	Linda Hart	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>We have noticed an increased difficulty in driving from our property on to the Sutton Road, sometimes 15 minutes and then you take a risk. The road is fast despite 40 mile an hour signs and no traffic cameras very few people stick to the rules. Over the years there have been many accidents. Being on the outskirts of Lichfield we use Tamworth for everything, it's already difficult to get doctors appointments and hospital ones, extra people will only make this worse. We have no local pub, no local doctors and one convenience store, not good. Our rates our paid to Lichfield council but that's all we have to do with the area and class ourselves as Tamworth.</p> <p>Having a lovely view for so long is one of the reasons we stayed for so long, and now you want to take that away. Will our property prices decrease? We will also have the noise from HS2 just down the road along with so much more traffic noise, when there is a problem with M42 or the A35 the extra traffic is horrendous, the house shakes when heavy goods vehicles use the road. What happened to conservation of the countryside?</p> <p>If this goes ahead I hope the road is widened, houses are not staring in my windows and traffic curbing is put in place.</p>	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO110	Marijke Williams	Policy ONR1: Green Belt	<p>There is no capacity for increased traffic, the local school is full to overflowing. The local doctors surgery can't cope with the extra pressure put on it and, despite several years of empty promises, Greenwood House still stands empty and hasn't been renovated/rebuilt as the new surgery. The increase in traffic from developments that have already taken place is unbelievable. A huge development is being developed near Chasewater but nothing done about schools or doctors there putting more strain on Burntwood. There are plenty of brown sites that can be used without breaking into green belt land. Some of the proposed use of green belt land smacks of land owners wanting to cash in on a lucrative market and to hell with the consequences.</p>	<p>The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.</p> <p>Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to</p>
LPRPO111	Elizabeth Devine	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>The road will not stand the traffic, there is no high school and only one primary school how will this impact upon the current primary school. There is plenty of land that can be developed that is an eyesore and unkempt. This would put more pressure on the local hospital and GP. Mile Oak suffers with traffic the congestion is horrendous.</p>	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO112	Tracey Mann	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>Oppose 800 homes in Mile Oak. The amount of traffic at Mile Oak, into Ventura and Fazeley is ridiculous and more would add to the misery. Schools are full and hospitals won't cope. This will be made worse by housing at Dunstable Park and Primark and its already gridlocked. Loss of Green Belt, loss of countryside and the impact on wildlife with the increase in light pollution this development can't go ahead.</p>	<p>Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.</p>

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LPRPO113	Vicki Cleaver	Chapter 19: Burntwood	Building on Green Belt is very wrong, especially for Burntwood. The increase in traffic will hit our little community very hard, our roads are riddled with pot holes and the increase would make this matter far worse. Lack of school places yet more and more houses are being built without a new school. This then pushes out the people who have lived here all their lives. We have no infrastructure here what few services we have are already under pressure. And for those that have moved here recently will have done so because of our green belt and beautiful surroundings, Why not build and renovate all brown field sites and all derelict buildings 1st before eating up what makes our area special. Save our green belt.	The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO114	Pam Beale	Chapter 5: Profile of the district	In regards of energy consumption in the district and positive moves to carbon reduction - where is the data on this? Other data I have seen recently from Friends of the Earth said otherwise re carbon footprint, with Lichfield having one of the highest embedded CO2 footprints in the country!	Policy OSC2 supports the use and supply of renewable and low carbon energy generation and their supporting infrastructure and further research is being undertaken to identify the most suitable areas for renewable energy developments.
LPRPO115	Pam Beale	Chapter 6: Issues	Key Issues for the district - 14 and 15 should be at the top, given that those areas impact on absolutely everything the Council will be doing.	The issues are not identified in priority order, each are equally important.
LPRPO116	Pam Beale	Chapter 7: Our vision	This section re 'natural environment and varied landscapes' is a great vision/aspiration for the district which needs to be integral to everything - planning, liaising with developers, local event organisers etc. Would be fantastic if it was upheld.	Support noted.
LPRPO117	Pam Beale	Chapter 8: Our strategic objectives & priorities	Strategic objectives are all admirable, and great to see climate and sustainability mentioned throughout - will be interesting to see if they remain as top priority in reality.	Comments noted.
LPRPO118	Pam Beale	Policy OSS2: Our spatial strategy	Be firm with developers and stick with the ambition to keep things net zero/low carbon footprint when house building, and have the incentive of reducing energy consumption with well insulated homes and eco energy options, even if national planning strategy does not expect councils to be so stringent.	Support noted.
LPRPO119	Pam Beale	Policy OHSC2: Arts and culture	Strategic Policy OHSC2: Arts and culture - as a volunteer for Lichfield Arts, it is good to read that the council want to be supportive and share resources with those who provide entertainment and activities which benefit the community as a whole.	Comments noted.
LPRPO120	Pam Beale	Policy ONR2: Habitats and biodiversity	Paragraph 16.16 We need to understand better what proportion of our district has canopy cover and what services this canopy cover provides. In order to gain this understanding we will undertake a canopy cover assessment for the whole district" - when might this be undertaken?	Comments noted. Further evidence is being prepared in support of the Local Plan.
LPRPO121	Pam Beale	Policy ONR4: Green infrastructure and connectivity	When will a green infrastructure study be produced?	Comments noted. Further evidence is being prepared in support of the Local Plan.
LPRPO122	Pam Beale	Policy LC3: Lichfield services and facilities	Paragraph 18.21 - "Further additional capacity over that identified for the current local plan is unlikely to be achievable" - so what will be done to ensure there is adequate secondary education spaces?	The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO123	Pam Beale	Policy KB1: Kings Bromley environment	How come there is no mention on the impact of HS2 in any of this? Kings Bromley will be badly affected by road diversions, numbers of lorries etc. and should be mentioned as a potential impact, even if the scheme does not go ahead as planned.	Comments noted. The proposed route of HS2 is shown on the maps accompanying the preferred options document.
LPRPO124	Pam Beale	Appendix B	Comment on Appendix B re Masterplan Content for Developers - this should specify high levels of insulation for homes, resulting in lower energy requirements. Materials used by developers should be as eco as possible to reduce waste and harm to the environment, minimum tarmac cover to ensure proper drainage.	Comments noted.
LPRPO125	Susan Morgan	Whole document	[Representation left blank]	Not applicable.
LPRPO126	Eddie Jones	Whole document	The local infrastructure will not cope with the proposed Mile Oak development of this scale, especially the local road network with high volumes of traffic at peak times. Also, the there will be a negative effect on wildlife and bio diversity which will already be adversely effected by the work being done locally on HS2.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. Policies within the plan safeguard biodiversity and deliver a net gain.
LPRPO127	Cathy Taylor	Policy SHA2: Strategic housing allocation land west of Fazeley	Agree with the vision for Fazeley. The proposed plan states that there is a struggle to provide health and well-being facilities, how will increased housing address this? It will putter greater strain on the existing services. The plan sets out to create sustainable transport such as bus, cycle and walking within the development and to link the communities. How will LDC influence bus transport from this area. Current local provision for cycling is non-existent and requires investment to ensure safety. Local roads are very busy with many large vehicles. The most obvious area for the development of cycling routes is the routes into Tamworth town centre. The need to link communities better is detailed in the proposal. the only realistic route to reach the new development from the main services in Fazeley is along Watling Street which is very busy and has poor air quality. How will existing hedgerows and trees be safeguarded? Delivering net gains in biodiversity and supporting the delivery of nature recovery network is an honourable ambition for the development. The land housing would be developed on is currently an interesting mosaic of habitats. Plan doesn't detail how deficiencies I in provision and quality of areas open solace will be addressed? Increase in traffic to the Mile Oak traffic lights is going to be a major issue, the junction is busy at any time of day and experiences major tailbacks at peak times. Developing the centre of Fazeley needs to be a high priority to regenerate the local area. The empty historic buildings would be stunning for accommodation. Strategic Policy ONR1 releasing the land north of the Lichfield Road at Mile Oak - I am supportive because this maintains the compact nature of the development.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.

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LPRPO128	Jeff Hateley	Chapter 7: Our vision	The document focuses too much on growth and I feel growth is in the wrong location such as west of Mile Oak which will be at the detriment of existing residents and communities. I object to SHA2 as there is not the evidence to support its release from the Green belt as not all the land was assessed in the Green Belt Review 2019. Paragraph 3 states that growth will focus on enhancing the sustainability of our villages and enable these communities to become cohesive, inclusive and healthy places. SHA2 will not do this for the existing communities as it would make them less cohesive by elongating the settlement, and less healthy by increasing traffic and pollution as well as destroying countryside and wildlife.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. Support noted. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.
LPRPO129	Michael Swinburn	Policy SHA2: Strategic housing allocation land west of Fazeley	The proposed development does not fit with the vision for Fazeley. Fazeley will gain nothing as it is too far away with non-existent parking. The preferred choice for shops will always be Ventura Park. Councils have a duty of care, not only to people but our environment and wildlife. If the area is covered with tarmac and concrete the run-off could have a serious impact on the area. What our environment needs is 8 million trees not 800 homes. The use of Green Belt for building should be avoided wherever possible. Brownfield land should always be considered first. In the Green Belt Review 2019 only part of the land being considered has been assessed. The road network in the area is already at breaking point and often grinds to a halt. Feeding a further 800 to 2400 cars will have a significant impact. New developments of this size should be located closer to Lichfield not Tamworth.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.
LPRPO130	Jeff Hateley	Whole document	Object to wording of 1.2 'Our vision for the district is one of growth.' I object as this growth could be at the detriment of existing residents and communities. I object to the option of growth in location west of Mile Oak (SHA2) as this is not the right location and it would worsen the lives of local residents.	A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements
LPRPO131	Maureen Swinburn	Policy SHA2: Strategic housing allocation land west of Fazeley	The proposed development SHA2 is on Green Belt land, this category of land should only be used in extreme circumstances. It is preferable that Brownfield sites should be used first. The Green Belt Review 2019 only assesses part of SHA2. The proposed development is therefore not based on evidence. Loss of Green Belt would have a negative impact on wildlife, biodiversity and landscape, particularly at Bourne Brook. Hs2 will already have a detrimental impact. The proposed development is too far away from the main services and facilities within Fazeley. The Council should be concentrating on improving the environment of Fazeley rather than extending the already long ward. The development would increase traffic congestion and pollution in the area and in particular at Mile Oak traffic lights. Another factor to be considered is housing development at Dunstall Park which is only one mile away. SHA2 would create a separate community and so will not be better connected to the existing ward. The development of another 800 homes is too large in relation to the existing community.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.
LPRPO132	Elaine Willett	Whole document	Strongly object to the proposal by a developer for Green Belt land in Hammerwich/Burntwood to be changed to enable the building of 1300 homes. The proposal will ruin our Green Belt. The loss of Green Belt would result in urban sprawl. We have had assurance from councillors that Green belt would be protected. The land acts as a buffer and keeps the identity of Hammerwich as a village. There is nothing more valuable than Green Belt.	The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO133	Lucy Hateley	Picture 20.1 & Policy SHA2: Strategic housing allocation land west of Fazeley	Object to the proposed allocation SHA2 as an option for growth because; it would create a new community that would not integrate well with the existing communities and would add additional traffic, noise, pollution and pressure on services which would worsen the health and wellbeing of existing residents; It would further elongate the linear settlement and would not be in accordance with the Draft Strategic Plan 2020-2024 to 'Shape Place'; It is not in a safe or suitable location and for the majority of people not within walking distance of Fazeley where the main services and facilities are; The 2011 Lichfield District Rural project for Mile Oak, Bonehill and Fazeley considered the development in this location was unsuitable and not liked by the community; large strategic developments should be located closer to a train station to encourage people away from cars. The train station is 3 miles away; The A453 is often heavily congested at Mile Oak traffic lights. At rush hour the road is often grid locked to Ventura Park. The A453 is key access route to Good Hope and further development and traffic could impact on emergency services being able to access this facility; Impact of the development would be on Tamworth Borough; it would create a new community which would add tremendous pressure on services and facilities in Tamworth; It is a large Green Belt site and I have not seen the evidence presented that explains exceptional circumstances for development. The Green Belt Review only assessed a small part of the site; SHA2 would have a negative impact on biodiversity; Proposed development is disproportionate to the size of the existing community and there is not the evidence on housing needs to justify 800 homes in this location.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.
LPRPO134	David Whitehouse	Whole document	Areas of Green Belt around Burntwood have been downgraded in the District Plan and I consider the Green Belt fields to have a higher rating than has been assessed. These areas are important leisure facility for local people and I believe Burntwood should be given ancient settlement status. Suggested 400 houses adjoining Coulter Lane - the road infrastructure is not sufficient for the extra traffic which will be generated from these houses. There are not enough facilities in Swan Island and its already difficult to park there. Local schools are full so extra housing makes little sense. Currently difficult to get doctors appointments. I would suggest it is a better option to locate extra housing within the blue hoarded site behind Morrison's.	The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO135	Marie Bell	Policy F3: Fazeley economy	I fail to see how the proposed site would add to the local economy. If anything I think people will end up using other facilities further away as Fazeley will become even more congested and people will not wish to sit in traffic or spend a long time riding around trying to park their vehicles to access the facilities. I therefore think it will have a negative impact and I will be less inclined to use the local services if they become inaccessible due to the large volume of traffic.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.

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LPRPO136	Marie Bell	Policy SHA2: Strategic housing allocation land west of Fazeley	Fazeley is only a small settlement and building 800 homes in the area is a considerable increase in the size of the settlement without the supporting infrastructure and facilities. Do not believe the proposed site is a suitable location. The site is too far away from the services and facilities in Fazeley. This would increase the volume of traffic greatly in the area. It would not be possible to walk to the facilities and the train station is too far away. Mile Oak junction already struggles to cope with the volume of traffic. The roads cannot cope with this column of traffic as it is often gridlocked at peak times now. The loss of Green Belt land is very sad and brownfield sites should be considered first. The loss of the countryside has a negative impact on wildlife and biodiversity of the area.	<p>Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.</p> <p>Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.</p>
LPRPO137	Marie Bell	Policy F1: Fazeley environment	The loss of countryside of this size can only affect the area with greater light pollution, air and noise pollution created by the houses and the extra vehicles. This could only have a negative impact on the wildlife and the people who live/work in this area. I do not feel that the loss of greenbelt land can be justified.	NPPF makes clear that changes to Green Belt boundaries can be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.
LPRPO138	Marie Bell	Policy F2: Fazeley services and facilities	Whilst there are services and facilities in Fazeley accessing these by road is very difficult now due to the volume of traffic and the lack of parking spaces available to use these services and facilities. The proposed site would contain between 800 and 2400 people and I cannot see how they will be able to access these the facilities at Fazeley for the reasons mentioned above. Services such as GP surgeries are already over stretched and this is without the further 750 new homes being built at Dunstall Park. Where will all these people from the new development and this proposed site go? It is clear that people will need GPs, dentists, schools, etc. but these services are not located near to the proposed site.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO139	Janine Warfield	Policy SHA2: Strategic housing allocation land west of Fazeley	There are too many houses for the existing community, which is too far from the town and railway station. This will lead to increasing congestion which has a negative impact on the quality of life for the local residents. This will become an out of town development which will not be easy to integrate into the existing community. The Government planning portal states that there are reasons for special protection e.g. control of spread of towns and villages into open countryside/green belt land. Green belt should be used as a last resort. There will be a loss of wildlife, light pollution, noise and congestion which will do nothing to enhance the area.	<p>Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.</p> <p>Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.</p>
LPRPO140	John Buckley	Policy SHA2: Strategic housing allocation land west of Fazeley	The proposed development of green belt land at Mile Oak Tamworth, I strongly object to. Firstly on the grounds that the green belt around a major city should not be used for commercial development, and secondly that the local infrastructure cannot support the additional population. The traffic light cross roads at Mile Oak is already overcrowded at peak times, and trying to cross the A453 Sutton Road is very difficult due to the existing volume of traffic, with any major increase it will become near impossible.	<p>Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.</p> <p>Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.</p>

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LPRPO141	Anthony Watkins	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>With regard to the consultation, I do fear that the whole story has not been told. Whilst it talks about 800 homes in the Mile Oak area adjacent to the Sutton Road, It does not mention the 750 houses that are planned for the area adjacent to Plantation Lane and Dunstall Park.</p> <p>Looking at the draft plan, I note that LDC is needing to provide 7300 homes for its own projected needs and a further 4500 for a shortfall from Greater Birmingham and the Black Country. Whilst not wanting to be parochial, surely Greater Birmingham and the Black Country can't just offload its shortfall onto a neighbouring community. There must be plenty of brownfield and greenfield sites in Greater Birmingham and the Black Country that are in need of development/redevelopment rather than lose precious greenbelt areas for ever by turning them into housing?</p> <p>Anybody who knows Fazeley and Mile Oak will know that over just the last few years, road congestion has increased exponentially. As recent as three years ago, the arterial routes into the Town from the South and West were uncongested and flowed freely. Fast forward just three or so years and the landscape has significantly changed. The A5 where it meets the traffic island at Fazeley and onto Two Gates is heavily congested at rush hour resulting in the traffic island often being gridlocked by traffic both joining from Drayton Manor and traffic in the opposite direction coming out of Town. Up the A5 at Mile Oak, a similar situation is in play. At rush hour now, traffic from the Mile Oak Traffic lights backs up along the Sutton Road often as far as Banglely.</p> <p>The 2040 proposal talks about the provision of a new primary school for Fazeley. There is no mention of Doctors surgeries, Clinics, a new Secondary School etc. that this size of development would need as the current infrastructure cannot cope.</p> <p>The size of the proposed development, when looked at on an OS map, will dwarf the existing Mile Oak and Bonehill settlements as well as most of the Fazeley settlement. This will destroy the character of the local community. In summary the proposal will not enhance the quality of life of local residents.</p>	<p>Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.</p> <p>Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.</p>
LPRPO142	Gordon Williamson	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>The proposed development site is not in a suitable location, away from the main area of facilities and services within Fazeley. Larger scale development should be located nearer to public transport infrastructure. Furthermore, it will worsen traffic congestion. The scale of infrastructure required to sustain this level of growth will have an adverse impact on Tamworth, not Lichfield. This scale of growth should be placed closer to Lichfield. Green Belt should not be used unless in exceptional circumstances, brownfield development should be implemented first. There is not the evidence to justify all of SHA2 being released from the Green Belt- the Greenbelt Review 2019 only assessed a third of the site (FZ1).</p>	<p>Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.</p> <p>Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.</p>
LPRPO143	Dennis Pollard	Policy ONR1: Green Belt	<p>Brownfield site should be developed within Burntwood before utilising green belt as well as the provision of infrastructures</p>	<p>The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.</p>
LPRPO144	Christipher Harris	Chapter 12: Our sustainable transport	<p>Provide a safe pedestrian/cycle route from Burntwood to Lichfield avoiding existing roads. This route to not be shared with vehicular traffic. If HS2 can be built then so can this scheme.</p>	<p>The local plan seeks to support and encourage sustainable modes of transport.</p>
LPRPO145	Christipher Harris	Chapter 12: Our sustainable transport	<p>Find a use for the disused railway between Brownhills and Lichfield. As a minimum this should be a cycle/pathway similar to many schemes around the country, this would not prevent future use of the track-bed for a future railway scheme. Minimal cots for maximum benefit. An alternative could be a light railway. If London can have these things then so should Lichfield/Burntwood</p>	<p>The local plan seeks to support and encourage sustainable modes of transport.</p>
LPRPO146	Christipher Harris	Chapter 12: Our sustainable transport	<p>Provide new access for vehicles to the proposed building development in the St Matthews area of Burntwood. Don't rely on Farewell Lane of Rugeley Road.</p>	<p>The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.</p>
LPRPO147	Christipher Harris	Chapter 12: Our sustainable transport	<p>Build a new vehicular route from Burntwood to Lichfield.</p>	<p>Comments noted. The local plan seeks to support and encourage sustainable modes of transport.</p>
LPRPO148	South Staffordshire Council	Whole document	<p>Welcomes and supports the approach adopted by Lichfield District in making a contribution of 4,500 dwellings towards addressing the shortfall in housing provision arising within the Greater Birmingham Housing Market Area. It is considered that this is a reasonable and proportionate response to housing shortfalls and is based on the same evidence base as that being used by South Staffordshire Council in our emerging Local Plan.</p>	<p>Comments noted.</p>
LPRPO149	John Kinson	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>800/1200 Vehicles, 800 /1000 Children, Schools, Doctors, Hospitals, Social amenities?</p>	<p>Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.</p>
LPRPO150	Paul Dawson	Policy ONR1: Green Belt	<p>I have lived in Burntwood since 1975. During this time I have witnessed significant changes, positive and negative. With any new plan/proposals I am a great believer in proactive planning to maintain sustainability of the infrastructure to benefit current residents and to cope with the increase in residents as a result of any future housing development. To remove areas of land from the Green Belt for the potential future housing development is detrimental.</p>	<p>Comments noted. The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.</p>

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LPRPO151	South Staffordshire Council	Policy ONR3: Cannock Chase SAC and River Mease SAC	Support the approach identified within the consultation document towards protecting the integrity of the Cannock Chase Special Area of Conservation (SAC). It is suggested however that consideration be given to amending the reference in the policy to a 'zone of influence' instead of a 15 km radius from the SAC.	No objection to proposed change.
LPRPO152	Hammerwich Parish Council	Whole document	Green Belt Review. Parcels HM1, HM2, HM3, HM5, HM6, HM7 should be reclassified as important. All these parcels provide green spaces between Burntwood and Hammerwich. To class them as unimportant is totally wrong. As all parcels obviously prevent sprawl, their classification should be important. To suggest they are not important is farcical. These parcels are obviously very important, they are protection against Merging. We feel all these parcels are obviously important in preventing encroachment. To say Hammerwich is not a historic town is totally without foundation. Parcels B8, B9, B10, B11 Whilst all the sites are classified as important, the 4th Purpose, HISTORIC TOWN, assessed by ARUP as NO, is clearly wrong and should be re-classified accordingly. We would ask for these comments to be taken on board in the formation of the Lichfield Local Plan, and that the classifications be formally revised.	Comments relate to the Green Belt Review, the methodology for which has been applied consistently across the District.
LPRPO153	Valerie Barber	Policy ONR1: Green Belt	Object to downgrading of green belt at Coulter Lane. Green Belt is a precious commodity, it would be a travesty to even consider losing this precious countryside. I am fortunate to have wonderful countryside and magnificent views. Mount Road could easily accommodate these houses and get the huge lorries who create potholes off our roads and keep our children safe. Farewell lane and Church Road are now busy roads following the development of St Matthews estate these roads cannot stand anymore traffic.	The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO154	David Widney	Policy SHA2: Strategic housing allocation land west of Fazeley	Opposed to destruction of Greenbelt on Sutton Road. Difficulty in finding school places, healthcare likely to be overwhelmed, goes against the universal anxiety about the serious state of global warming and threat to good health. Sutton Road already has heavy traffic with residents waiting several minutes to get on the road which is frustrating and dangerous.	Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.
LPRPO155	Pauline Lacey	Whole document	The proposed Mile Oak development is totally unsuitable and unacceptable. The area is already being blighted by the nearby excavation work for HS2 which will compromise wildlife and bio diversity. The local road network will not cope with the increased volume of traffic which will increase in any case over the next two years due to the housing development at Ventura Park Road. An independent environmental report will highlight the damage that the proposed development will do to our local wildlife and natural environment.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. Policies within the plan protect biodiversity and require a net gain in biodiversity from new developments.
LPRPO156	Lauren Morgan	Whole document	[Representation left blank]	Not applicable.
LPRPO157	Spencer Louca	Picture 20.1 & Policy SHA2: Strategic housing allocation land west of Fazeley	Object to the proposed allocation SHA2; 1) As a resident we experience issues with volumes of traffic on Sutton Road on a daily basis. Year on Year the volumes of traffic are increasing. 2) We regularly witness congestion and emergency services struggling to get through the volumes of traffic. 3) Any issue on the A38 traffic is directed along the A453 which causes major congestion. 4) Mile Oak traffic lights are a major issue with accidents and queuing traffic. 5) The Dunstall Lane development and development in Hopwas will further add to volumes of traffic. The route cannot handle the volumes of traffic now so conditions will be worse than the already are. 1) The site is a Green Belt site which would not likely be built on. This will detract from our property and affect our value. Due to the need to provide affordable housing on the site would mean concerns over crime levels increasing. Brownfield sites should be considered before Green Belt. 2) With 800 more families in the area it was explained that it would fall to Tamworth to provide infrastructure. Schools within the area are already stretched. 3) There are no facilities within the immediate area. Other than a bus route there are no other local transport links without the use of the car to the train station over 3 miles away. 4) Development would not improve the existing communities. It would add burden to the local amenities. 5) Loss of countryside is already affected by the HS2 railway development, further housing development will be very disruptive to local residents. Very little notice was given about the meeting held at Fazeley Town Hall in December and the period to respond seems to be very short.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.
LPRPO158	Charles Sanders	Whole document	[Representation left blank]	Not applicable.
LPRPO159	Fred Butler	Policy ONR1: Green Belt	Of the view that Hammerwich Greenbelt areas to HM1 to HM7 should be reclassified as important as the parcels form a natural separation between the village and the settlement of Burntwood.	Comments relate to the Green Belt Review, the methodology for which has been applied consistently across the District.
LPRPO160	Pauline Rathband	Whole document	Strongly object to the Policy ONR1 and the proposal to remove land off Coulter Lane from the Green Belt. I believe there are enough brownfield sites within Burntwood to accommodate all the housing needs for the natural population growth of Burntwood. Specifically I believe land could be made available at Mount Road where there are many industrial units some of which are vacant and in a poor state of repair. The sites of Coulter Lane helps to frame what is left of the ancient settlement of Burntwood and if that is lost LDC will have destroyed the rural setting of the old Burntwood village. Land is highly valued by Burntwood residents and vital for their health.	The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.

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LPRPO161	Zetta Kerr	Policy SHA2: Strategic housing allocation land west of Fazeley	Opposed to destruction of Greenbelt on Sutton Road. Difficulty in finding school places, healthcare likely to be overwhelmed, goes against the universal anxiety about the serious state of global warming and threat to good health. Sutton Road already has heavy traffic with residents waiting several minutes to get on the road which is frustrating and dangerous.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.
LPRPO162	Fazeley Town Council	Policy SHA2: Strategic housing allocation land west of Fazeley	Strongly believe that the proposal for 800 dwellings south west of the Mile Oak junction is not the right option for Fazeley. The town council is not anti-housebuilding; recognise the need for more dwellings in the area but this solution is not viable. Fazeley currently has around 2000 dwellings, an additional 800 would significantly increase the size of the ward and create a massive strain on infrastructure and resources. Sutton Road/Mile Oak junction is incredibly busy at peak times. It is also very busy coming A5 bypass and down Plantation Lane and an extra 800 dwellings could deliver an extra 1600 extra vehicles. No matter what infrastructure solutions are in place the sheer volume of extra vehicles will only make the situation worse. There is a large development at Dunstall Lane within Tamworth Borough. This will be problematic for the traffic flow itself with the proposed development at Mile Oak it will make the traffic situation chaotic at best and potential dangerous at worst. We would require an urgent traffic survey on the area and also detailed plans to see how capacity can be increased on the surrounding roads. Aware there is provision for an extra primary school, but with additional homes and the existing primary schools at capacity this will cause strain on the local primary schools. Fazeley is within the Rawlett catchment and this is already at capacity. Although the homes will be built within Lichfield District, residents will use the resources and facilities located within Tamworth Borough so would need to see adequate mitigation and infrastructure to accommodate this. There are also concerns around the ingress and egress to the site. Also have reservations about HS2 which will add more strain on the local area. We have been approached by dozens of residents in Mile Oak who are concerned by the scale of the development. All eleven Fazeley Town Councillors are voicing their opposition to the proposals.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO163	Christopher Harris	Whole document	Restore passenger train link from Lichfield TV to Burton. This provides alleviation to A38 and also an alternative route north from Birmingham. It is appreciated that the route is not electrified at present, but dual Diesel/Electric units could be used or even Hydrogen/Electric trains or a light railway.	The local plan seeks to support and encourage sustainable modes of transport.
LPRPO164	Martyn Rowley	Policy ONR1: Green Belt	Recent developments have not given the provision of extra schools, shops, roads or medical services. The traffic congestion from (Fulfen school) on Rugeley Road and Church Road is heavy and dangerous in regards to parking during school opening and closing times. Commuting into surrounding towns/cities has become very depressing and sometimes impossible due to the amount of traffic currently from so many residents within the Burntwood area. Surely you would think as councils both Lichfield and Burntwood would have policies that try and get people to move towards either Public Transport. I really do believe just adding more houses to the Burntwood area would add further stresses and strains to an already what seems a none existent infrastructure. In the site proposed to be removed from the greenbelt is the wonderful wildlife. It would be a real tragedy if this land was built on and developed, removing what is open beautiful countryside. I really do believe that our environment and wildlife must be better protected, I ask you please do not remove this land from the greenbelt.	The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO165	Karen Morris	Policy SHA2: Strategic housing allocation land west of Fazeley	With reference to the proposal to develop 800 homes on Mile Oak green belt I wish to register my disapproval. The infrastructure will be unable to cope with such a development which could add another possible 1000 vehicles to the mix; at present there are very few times of the day when the Sutton Road and the surrounding area is quiet. It can be frustrating waiting to exit our drive especially at rush hours but also even as early as 4.00pm in an afternoon. Getting through the town centre at busy times of the day can also be trying (and any way in and out in the lead up to Christmas is a nightmare). With the proposed HS2 build literally on our doorstep the disruption that will be caused is bad enough without another housing development causing problems for residents. Tamworth has had more than its fair share of developments over the years and I feel we have reached our limit. We do not have enough GPs in the Tamworth area to cope with its population at present let alone another 1600+ people, and what about schools? What about the wildlife that will be displaced, or worse? I do not want to live in the centre of a town, which is why we moved to the outskirts of Tamworth next to the green belt, but I feel that this is how it will seem if this development goes ahead. I strongly object to this proposal and hope that my view will be taken into consideration.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.
LPRPO166	Patricia and Michael Humphreys	Policy SHA2: Strategic housing allocation land west of Fazeley	Object. Concerned about the increase of traffic along the A5, the Sutton Road and Bonehill Road, which already experiences tailbacks at certain times. There is a lack of facilities in this area; doctors surgeries, schools and the small Peel Hospital, which is under threat of closure, is not equipped with an A & E Department. Building on the Green Belt which is fast disappearing in the Tamworth area would be a very sad loss.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.

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LPRPO167	Geoff Stanley	Policy SHA2: Strategic housing allocation land west of Fazeley	Grave concerns. There has been an absolute massive change in the amount of traffic locally. On a weekday from around 4.30 pm there is a queue all of the way down the Bonehill Road for about half a mile which then blocks the A5 bypass exit onto the same. This would be made worse by the building of 800 homes with an average of two cars per family that would completely exasperate the situation. I think that Tamworth has had its fair share of growth in the past few years and its infra structure is under pressure already. On the Sutton Road it takes up to ten minutes to get off the drive to go to work. There are surely more suitable areas for this development in the whole of the Lichfield catchment area, but such a huge influx of people in this area would be catastrophic.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.
LPRPO168	Roy Smith	Policy ONR1: Green Belt	Loss of green amenity space to local residents – detrimental to residents well being Loss of an attractive landscape feature Loss of ecology and wildlife habitats – downgrading the site will cause this to be negatively impacted. Impact on local infrastructure, roads and drainage in particular – no clear indication how this will be mitigated.	The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.
LPRPO169	Paul Gough	Policy SHA1: Strategic housing north of Lichfield	Supportive of the proposed new Green Belt and new housing approach. I understand that new houses need to be built and a balance needs to be struck. I am of a generation where it was much easier to buy a house. It is very different for the current generation of young adults. I would ask that Lichfield council ensure the right balance of starter homes are built on the new housing developments to ensure sufficient provision for the next generation to allow them to live in the area that they have lived their whole lives. It is also important that Lichfield retains it's character and the new green belt would allow a proper balance of new housing and green areas to be retained for future generations.	Comments noted. Proposed policy OHF2 seeks to deliver a mix of dwellings to meet the needs of the District's demographic including provision of starter and affordable homes and smaller homes.
LPRPO170	Jayne Ackers	SHA2: Strategic housing allocation land west of Fazeley	Object to the proposed development in the Green Belt at Mile Oak. Sutton Road has become increasingly congested over the time we have lived in the area. The number of serious accidents has increased. In addition we have the proposed HS2 development which is going to take many years and will cause heavy traffic flow to and from Sutton Coldfield. Development of a further 800 houses will cause enormous additional disruption and cause grid lock. 2) Residents of a future estate will add further pressure to existing schools that are already at breaking point with no space to expand and certainly no willingness on the part of local government to invest in them. Standards will decrease and children will receive a poor service. Similarly secondary schools and SEN services will also be put under pressure. 3) The value of existing houses within the area will take a huge hit. Are the council prepared to lower the council tax accordingly? 4) There have been many developments within the area declined planning permission because of the congestion they would cause and the safety perspective of the surrounding areas. 5) A development of this nature will put pressure on the immediate area. there are plenty of brown sites in the area without encroaching onto Green Belt which are protected for a reason.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.
LPRPO171	Lone Star Land (Reuben Bellamy)	Policy OHF1: Housing provision	Supports the policy that allows for development identified by neighbourhood plans. This ties in with national planning practice guidance. However policy OHF1 makes no provision for self and custom house building. Local Authorities have a statutory duty to give enough suitable development permissions to meet the demand of its self and custom build register. The register is not available on the Council's website. It is not possible to know the level of demand and the type of self build property required. Therefore as it stands the policy is not sound as it is not consistent with national policy or the statutory duty. The policy allow for the development of small sites specifically designed to address the demands for self build and custom build. The NPPF paragraph 68 requires local authorities to identify land to accommodate at least 10% of their housing requirement - 1180 homes - on sites no larger than 1 hectare. On the face of it the preferred options makes no provision for this and is therefore not sound. It may be that this requirement will be part of the allocations plan, if this is the case then it needs to be made clear in this policy.	Comments noted. Details of the council's self build register are published within the authority monitoring report, including levels of demand and the type and location of demand. Preferred Options document identifies strategic sites only. Non strategic sites currently allocated through this existing local plan are identified at appendix A.
LPRPO172	Lone Star Land (Reuben Bellamy)	Policy OHF4: Affordable housing	Wording and intent of the policy is not consistent with national policy and will play havoc with the delivery of housing. Paragraph 57 of the NPPF requires that site viability is addressed at the plan making stage. It is difficult to see how developers can bring sites forward when the level of affordable provision until an application is determined. Paragraph 13.23 seems to suggest that a limit will be set at 35% or 40%, if that is what is meant and that viability is to be tested at local plan level then this is acceptable but that is not what the policy currently says. The policy needs to be clear and define in terms qualifying sites with reference to paragraph 63 of NPPF. In addition it needs to be clear that 10% of the homes on major developments will be made for affordable home ownership.	The council continues to gather evidence in support of the local plan. Further viability evidence will be gathered to inform the further stages of the local plan.
LPRPO173	Lone Star Land (Reuben Bellamy)	Policy ONR1: Green Belt	Support the policy provision allowing for non-strategic changes to the Green Belt boundary for all settlements in the Green Belt through neighbourhood plans and the allocations document. Paragraph 136 of the NPPF states that where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans. That said, it is important that this plan need to fully justify the need for changes to Green Belt boundaries.	Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.
LPRPO174	Lone Star Land (Reuben Bellamy)	Policy LA1: Little Aston environment, services and facilities	Policy does not take account of the Little Aston Neighbourhood Plan policy CMH1 (Provision of a Community Hub) which seeks the provision of a community hub on land to the north of Little Aston Lane. This land is Green Belt and a community hub building would be inappropriate development. It is therefore important that the strategic plan facilitates the delivery of this Neighbourhood Plan policy. The settlement boundary for Little Aston does not include the area around Forge Lane, with includes the school. This area is clearly part of Little Aston and should be included within the settlement boundary.	Comments noted. It is not the role of the Local Plan to duplicate policy within made neighbourhood plans or future local plan documents.

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LPRPO175	Lone Star Land (Reuben Bellamy)	Policy OR1: Small rural villages and our wider rural areas	Support policy. It is important that the plan allows for rural communities to make provision for housing and other development through neighbourhood plans. However, this policy needs a fall-back mechanism if the neighbourhood plans do not deliver the required dwellings.	As per paragraph 9.12 we will support those communities with neighbourhood plans to identify and allocate development sites for housing growth through the neighbourhood plan review process. If neighbourhood areas are unable to allocate sites we will carry out this role in line with the spatial strategy and other relevant policies in the plan.
LPRPO176	Lone Star Land (Reuben Bellamy)	Policy NS1: New settlement	Policy NS1 is for a development proposal that is intended to meet development needs beyond the plan period. This plan is establishing the principle of a new settlement as the most appropriate way to meet those as yet unknown needs in over 20 years time. The Sustainability Appraisal appears to have only considered a new settlement as a reasonable alternative to meet needs up to 2040. There is no assessment of alternatives for needs post 2040. Deciding that a new settlement is the appropriate strategy formatting post 2040 needs now cannot be justified, as no reasonable alternatives have been taken into account. There is also a question of deliverability. No location is identified and it cannot be assumed that there is a location (presumably outside the Green Belt) with willing landowners to create a 10,000 dwelling new settlement. And until a location is known it is not well possible to assess whether this would be a sustainable option to meet the Districts post 2040 needs. Similar issues we grappled with by the inspector into the Hart Local Plan which similarly proposed a new settlement to meet development needs beyond the plan period. There was a difference in that an area of search was identified. The inspector concluded that the policy should be removed from the plan by a main modification.	The completion of a high quality new settlement is a significant undertaking which will take a number of decades to plan for and complete. A location will be identified through the plan making process through future reviews of the plan accompanied by sustainability appraisals which will assist in determining the most appropriate strategy at the time.
LPRPO177	John Turnbull	Policy ONR1: Green Belt	The local plan cannot outline the exceptional circumstances to justify leading to the removal of the green belt and it is at odds with the Conservative manifesto pledge to 'protect and enhance the green belt'. Asks how prescriptive LDC are going to be with their plan so that developers provide enough for what residents want. Questions how doubling the size of Hammerwich can be justified when it is covered by the green belt. Questions the lack of infrastructure available to serve new development and asks how the aim to reduce car usage is met with the current local plan.	The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice. The Preferred Options document does not propose any new homes within the Green Belt at Hammerwich. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO178	Jeff Hateley	Policy ONR1: Green Belt	[Representation left blank]	Not applicable.
LPRPO179	Jason Carwood	Policy SHA4: Strategic housing allocation off Huddlesford Lane	This allocation fails to consider alternative Green Belt sites which have also been noted as deliverable in the SHLAA. Site commonly floods with the road becoming blocked. Site would negatively affect and intrude in to the adjacent conservation area. Access would be next to a known serious accident spot and section of Back Lane used for on street parking. Most other sites don't have footpaths and so don't contribute to openness as much as the proposed site. Release of subsequent small site gradually could help in a less disruptive adjustment to the very limited services. Due to limited bus services a large increase in dwellings will lead to increased car usage through the village.	A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed. Policy SHA4 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO180	Councillor Steven Norman	Chapter 19: Burntwood	Agree with the Vision. The Neighbourhood Plan (out for Regulation 16 Consultation) supports this. It is a realistic and practical vision achievable with current planning policies.	Comments noted.
LPRPO181	Councillor Steven Norman	Policy B1: Burntwood economy	The "High Street" is finding it difficult to survive the "on-line" age when only retail development is considered but a retail and leisure mix seems to be the way forward and the Burntwood Neighbourhood Plan supports this. It is again realistic about the feasibility of a town centre. We are a town without a town centre but with a population of almost 30,000 including neighbouring Hammerwich. If we are to sustainable and reduce air pollution then we need services locally and so infrastructure must be built before any larger housing developments to comply with the government's on NPPF.	The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice. The Preferred Options document does not propose any new homes within the Green Belt at Hammerwich. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO182	A C Revitt	Whole document	Will not deliver the housing needs in a sustainable manner. Continued expansion of existing settlements exacerbates shortfall in services. Should create new settlement. Doesn't address changes to achieve carbon neutral. Future settlement should be by electrified railway, suggest adjacent A38 to the North east of Lichfield City or near Wall village. Support vision for Burntwood, however current proposals erode surrounding green belt and should be removed. There are adequate brownfield sites available e.g. 'blue hoarding' site and former Olaf Johnson sites. Consider unlikely to be viable following the commercial development at Tamworth and Cannock. Should focus on improvement of local service areas, with Sankey's corner developed as such, any plan for a more comprehensive town centre should be removed. Development at Coulter lane is remote from employment areas so will create commuters. Lack of railway connection is a major impediment to the long term development of Burntwood, the impact of climate change should trigger an electric light rail connection of the existing line. Piecemeal conversions should be counted towards the 840 total requirement.	The completion of a high quality new settlement is a significant undertaking which will take a number of decades to plan for and complete. A location will be identified through the plan making process through future reviews of the plan. Support noted. The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO183	Councillor Steven Norman	Policy B3: Burntwood services and facilities	There has been a failure of the NHS and CCG to ensure Burntwood's population gets the health facilities it needs and was promised. It does not look like work is going to start on the Greenwood House site. The temporary building at Burntwood leisure centre has been granted temporary permission for the third time. The NHS appear to be looking at this facility again but there is no guarantee that Burntwood will get the health facilities it was entitled to following closure of Hammerwich Hospital in 2008.	The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process. The District Council continues to engage with the CCG and NHS to seek to ensure appropriate infrastructure is provided.

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LPRPO184	Councillor Steven Norman	Policy OSC1: Securing sustainable development	This policy is main one affecting Burntwood in so far as the town is not sustainable without the infrastructure needs - and has needed for some years. No further major housing development should go ahead without the infrastructure needed to support it. Not just drains and roads (the easy ones) but the shops and the health facilities.	The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO185	Councillor Steven Norman	Policy OSC2: Renewables and low carbon energy	Agree.	Comments noted.
LPRPO186	Councillor Steven Norman	Policy INF1: Delivering our infrastructure	This is essential for Burntwood and must be a priority for this Plan.	The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO187	Councillor Steven Norman	Chapter 12: Our sustainable transport	Whilst I accept that the rural areas are the most disadvantaged by the cuts in bus subsidy by the County Council Burntwood needs the infrastructure in order to reduce the travel to other towns.	The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO188	Councillor Steven Norman	Policy OHF1: Housing provision	The Green Belt must be the last place to look for housing sites and building on green belt land must be resisted. In Chase Terrace ward I support the 'important' classification given to three sites abutting the ward boundary. I find it difficult to understand why all other land is not subject to hierarchical grading and would ask for a justification to this.	Comments noted. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.
LPRPO189	Councillor Steven Norman	Chapter 14: Our economic growth, enterprise & tourism	Agree that a town centre is needed for Burntwood as well as retaining the Neighbourhood Centres in the town. This is also emphasised in the proposed Neighbourhood Plan.	Support noted.
LPRPO190	Councillor Steven Norman	Chapter 15: Our healthy & safe communities	Two new health centres are essential for a town the size of Burntwood and a replacement for the "temporary" Health and Wellbeing Centre must be a priority of the NHS and Councils.	The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process. The District Council continues to engage with the CCG and NHS to seek to ensure appropriate infrastructure is provided.
LPRPO191	Councillor Steven Norman	Policy OHSC2: Arts and culture	Without the funding from Central Government it is difficult to see how any of this can be achieved.	Comments noted. The district is rich in cultural and art assets and activities. Policy seeks to ensure these assets are protected and can grow and adapt to be relevant to our communities and play a part in social interaction.
LPRPO192	Harold Mortimer	Policy SHA2: Strategic housing allocation land west of Fazeley	Proposal is absurd due to the volume of traffic in Fazeley, Bonehill, Mile Oak, Sutton Road already due to Ventura and Drayton manor Park. Not enough places in local schools, Peel hospital overloaded also Good Hope Hospital and doctors surgeries. Already houses are being built in Dunstall lane 750 which will effect roads in this area. Traffic not only congested at weekends but mid week at school times and work times which makes queues long and must make it difficult for emergency services to get through.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO193	Kevin Hall	Picture 20.3 & Policy SHA4: Strategic housing allocation land off Huddlesford Lane	How will current infrastructure meet the requirements of potentially 150 more cars on the roads in Whittington especially at peak times? How can you deliver net gains in biodiversity when the building of properties on Green Belt is to the detriment of biodiversity. Why would you need a bus from the proposed development to the main settlement as on edge of settlement? No mention of how pressure on existing services such as GPs and schools will be addressed. Saying the current size of the village is unsustainable is being used as a reason to build on Green Belt.	Policy SHA4 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO194	Val Grundy	Whole document	State the Greenbelt is important in Hammerwich so as to stop any future building on it. Save our Greenbelt in Hammerwich.	The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO195	Edingale Parish Council	Policy OR1: Smaller Rural Villages and our wider rural areas	Support principle of policy as a whole. However feel there is a need to provide further infrastructure in terms of public transport accessibility to and from the village.	Comments noted. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO196	Charlotte Draper	Policy SHA2: Strategic housing allocation land west of Fazeley	800 dwellings in this location is unsuitable due to the impact on traffic. Mile Oak is a nice quiet village and we do not want to become an urban environment. Walkers and dog walkers use the green belt and I feel you are trying to ruin the countryside. There is not enough medical infrastructure and schools to cater for this level. I would not want to live around this area if the houses were to build.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.

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LPRPO197	Marcia Parr	Policy ONR1: Green Belt	Greenbelt land should not be developed for housing. Additional housing in this area will add to already busy roads and infrastructure that can not support additional population e.g. gap services	<p>The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.</p> <p>Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.</p>
LPRPO198	Brendan Dakin	Policy ONR1: Green Belt	<p>I am writing to object to the proposed move to release greenbelt land for future housing development on the land around Coulter Lane. The area is the green space and the beautiful countryside walks. If it goes for development it will be a loss to both our children and grandchildren. There are a number of brownfield sites around Burntwood that could be used instead. Before building new retail units to sit empty let take a good hard look before our money is wasted.</p> <p>The biggest thing as I see it is that the infrastructure within our area needs addressing before digging up our greenbelt is even considered. Please exhaust the brownfield sites first then take a pragmatic look at the options and move forward with fresh ideas which protect and preserve our precious countryside.</p>	<p>The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.</p> <p>Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.</p>
LPRPO199	Pam Stretton	Whole document	<p>I am yet again aware of proposals to develop the land detailed below.</p> <p>Over 10 years local residents have complained strongly against this development. Burntwood would expand encroaching and merging into Brownhills which would cause loss of character and increasing a mass sprawl. The green belt is necessary for air quality and the natural environment which every day people are more aware of protecting it.</p> <p>Burntwood has already built on many disused sites, but the increase in traffic combined with a complete lack of infrastructure in health and education to name but 2 things would further detract the quality of life for existing residents. The increased traffic would be detrimental to people's health by impacting on air quality further implicated by removing green areas.</p> <p>Local flora and fauna would also be impacted. The area is near Chasewater which could cause flooding if there was a breach.</p> <p>In our opinion there are many derelict brownfield sites, and as I grew up in Walsall know some which have been disused for 50 years. I think a more collaborative approach to the need for housing and the need to keep green areas and to improve brownfield sites which would improve the whole Midland region for everyone.</p> <p>We must strongly protest against these proposals and would like to hear the outcomes of more collaborative working.</p>	<p>The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.</p> <p>Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.</p>
LPRPO200	Anthony Pritchard	Whole document	<p>Concerned that property developers will take opportunity to get existing Green Belt land released for development and objects to any such release.</p> <p>Understands that once such developer has plans to build 1300 houses in the Green Belt boarded by Hospital Road and Norton Lane</p> <p>Believes the countryside should be protected from encroachment. Urban regeneration is possible by encouraging re-use of derelict and urban land instead of destroying countryside.</p>	<p>The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.</p> <p>Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.</p>
LPRPO201	Norah Whitehouse	Chapter 19: Burntwood	Reject and oppose any homes being built on land in Hospital Road	<p>The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.</p>

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO202	Pam Stretton	Chapter 19: Burntwood	<p>Over 10 years local residents have complained strongly against this development. Burntwood would expand encroaching and merging into Brownhills which would cause loss of character and increasing a mass sprawl. The green belt is necessary for air quality and the natural environment which every day people are more aware of protecting it.</p> <p>Burntwood has already built on many disused sites, but the increase in traffic combined with a complete lack of infrastructure in health and education to name but 2 things would further detract the quality of life for existing residents. The increased traffic would be detrimental to people's health by impacting on air quality further implicated by removing green areas.</p> <p>Local flora and fauna would also be impacted. The area is near Chasewater which could cause flooding if there was a breach.</p> <p>In our opinion there are many derelict brownfield sites, and as I grew up in Walsall know some which have been disused for 50 years. I think a more collaborative approach to the need for housing and the need to keep green areas and to improve brownfield sites which would improve the whole Midlands region for everyone.</p>	<p>The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.</p> <p>Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.</p>
LPRPO203	Mr and Mrs Clarke	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>Expresses concern at poor promotion of the consultation period, have seen no publicity from Lichfield District Council. Greatest concern is loss of countryside, effect on environment and loss of local amenity for residents. Landowner told us he would never sell, is he being forced into compulsory purchase?</p> <p>If the public footpath is removed opposite Hints Road residents will be left with nothing locally. Land is currently farmed as arable and have seen an abundance of wildlife there. Also aware of the presence of Great Crested Newts in Bourne Brook within the identified Green Belt land. If 800 houses are built then wildlife will be lost, killed or displaced in the area, there are also woods in the area that if destroyed will negatively impact the area and the air quality.</p> <p>Questions the intensity of housing development in the area with current developments being built in TBC area for 750 houses. This will add to volume of traffic and added pressure to infrastructure of the area. This will create additional demands on already overstretched hospitals, GPs schools and colleges. Also queries drainage and sewerage solutions, think the development could present a flood risk to houses built at lower levels.</p> <p>Character of neighbourhood will be changed with this development. Notes HS2 is to run through the valley behind the proposal, didn't anticipate both HS2 and housing development taking place when house was bought, and would not have purchased house if knew housing development would take place on Green Belt land opposite us .</p> <p>Traffic volume is an issue already with Ventura Park, Mile Oak traffic lights, Plantation Lane, Sutton Road. HGVs are a particular problem at Hints Road along with traffic for Drayton Manor.</p>	<p>Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.</p>
LPRPO204	Alan Grimmett	Whole document	<p>We consider that priority must be given to an 'Infrastructure First' approach, particularly in respect of the road network and other vital infrastructure such as Flood Protection, Hospitals, Doctors, Schools, Shopping Provision etc. Brownfield sites should be developed first.</p>	<p>The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.</p>
LPRPO205	James Johnson	Whole document	<p>Objects to proposed building of 1300 houses or any future development on Green Belt bordering Hospital Road and Norton Lane in Burntwood.</p> <p>Area has a small road infrastructure, so 1300 houses would cause massive problems. Wildlife would be affected. Air pollution would increase from increased traffic.</p> <p>Local school, GP surgeries, dentists and hospitals are all at full capacity do more residents would put a massive strain on these facilities.</p>	<p>The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.</p>
LPRPO206	Tracey Johnson	Whole document	<p>The greenbelt is a special part of the area. The area has a small road infrastructure, so 1300 houses would cause massive problems. Wildlife would be affected. There would air pollution from the increase in traffic. I would like to think that in these current times, where focus on the environment is of major concern, Lichfield council would consider the impact, this development would cause. Our local schools, doctors surgeries, dentists and hospital are all at full capacity, so more residents would put a massive strain on these facilities.</p>	<p>The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.</p>
LPRPO207	Richard Bunn	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>Objects to proposed development in Fazeley. Main reasons for objection are:</p> <p>Not in a suitable location - too far from the facilities and services in Fazeley, residents won't be able to easily walk or cycle from the site to anywhere. Strategic developments need to be located nearer train stations.</p> <p>It will worsen traffic congestion as there is also 750 homes being built at Dunstall park near Ventura.</p> <p>Impact on Tamworth - strategic development should be located near Lichfield and not Tamworth. Provision of schools, support services and doctors will fall to Tamworth Borough and not Lichfield which is not accessible.</p> <p>Loss of Green Belt - SHA2 would not improve quality of life of local residents it would burden local facilities. Level of development is disproportionate to the size of the existing community.</p> <p>Loss of countryside and impact on wildlife, biodiversity and landscape.</p> <p>Mile Oak already suffers from light pollution, an additional 800 homes would increase this.</p>	<p>Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.</p> <p>Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.</p>

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LPRPO208	Christine West	Whole document	My first thought was why there , when there are plenty of smaller plots of waste land in the area which could be developed. Old housing with land could be bought and redeveloped. But once again the countryside has to suffer. There are other new houses being built locally do we really need to do this. The road systems is at breaking point. Travel times are horrendous, if anything breaks down big problems. Sorry until all the old brown land has been used to its best potential , please leave the green land alone.	A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO209	Rebekah Brain	Policy SHA2: Strategic housing allocation land west of Fazeley	Plans to build on the Green Belt are ridiculous. Why do you want to build on yet more land to house families and increase congestion? Where are the children going to go to school? Doctors, dentists and NHS are overstretched. Environmental impact will increase also. Against the decimation of the Green Belt	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.
LPRPO210	Paul Wright	Policy SHA2: Strategic housing allocation land west of Fazeley	In favour of the proposed development of 800 homes at Mile Oak. Aware that more housing is required and the site proposed will cause little impact on the area in our view. With correct planning we are sure it will even help the area, giving an incentive for improving the local roads and public transport links, which at the moment are very poor.	Support noted. Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO211	Stephen Cowley	Whole document	Object to the Local Plan in which a builder is looking to build 1300 houses on Green Belt in Hammerwich for the following reason: lack of infrastructure, detriment to the environment, overcrowding, strain on health service and schools, lack of shopping facilities, blot on landscape. Objections are the same for whichever parcel of land is taken out of the Green Belt. There are plenty of places for housing to be converted - empty shops and flats above, empty buildings and brownfield sites.	The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO212	Trevor Watson	Whole document	Object to any changes being made to the current Green Belt Strategy. Concerned that any changes would eventually allow building on the areas which would result in Burntwood, Chasetown and Hammerwich becoming one big urban sprawl. If the field behind Highfields Road were to be changed there would be no conurbation between Chasetown and Brownhills. Lichfield and its surrounding areas would then lose its identity. Green Belt Strategy needs to be left as it is for natural drainage for the area and the preservation of wildlife in the area.	The plan contains policies to protect the Green belt. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.
LPRPO213	M Scattergood	Policy SHA2: Strategic housing allocation land west of Fazeley	Proposed development would make a bad situation worse in terms of traffic increase on Sutton Road along with the increase of accidents. With the development of the A5, Sutton Bypass and toll relief road projects the main road has turned from an A road into a primary road ad is overloaded with traffic during peak travel times, this development would make getting off the estate a very hazardous task.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO214	Colin Birch	Whole document	Burntwood /Hammerwich area cannot support more large housing developments. We are not providing the facilities that are required for new housing and the facilities we already have are inadequate for the population already living in the area.	The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO215	Brian Symons	Policy SHA2: Strategic housing allocation land west of Fazeley	Proposed development would make a bad situation worse in terms of traffic and congestion. Mile Oak junction is constantly busy, as a Fazeley cross roads. Significant changes would need to be made to existing road layout and infrastructure to make this viable, with long term disruption to local residents. There is also a lack of general facilities and infrastructure to support a development of this size.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO216	Susan Simcox	Policy ONR1: Green Belt	Green belt should not be developed on and should be protected.	The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.
LPRPO217	Glenys Ensor	Policy ONR1: Green Belt	Green belt should not be developed on and should be protected. Open land is vital to the mental and physical health of people living in and visiting the area and green belt forms a vital asset to the area;	The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.

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LPRPO218	Kate Dixon	Policy ONR1: Green Belt	Areas of Greenbelt land surrounding Burntwood have been downgraded in the District Plan. I consider the Greenbelt fields to be of a higher value than has been assessed. These form important leisure facilities for local people. Burntwood should be graded as an ancient settlement affording extra protection. The suggested 400 houses adjoining Coulter Lane - this is not a suitable option as these roads are already heavily used and could not withstand extra traffic and doesn't have sufficient infrastructure.	The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO219	Phyllis Higginson	Policy SHA2: Strategic housing allocation land west of Fazeley	Proposed development would make a bad situation worse in terms of traffic and congestion. Mile Oak junction is constantly busy, as a Fazeley cross roads. Significant changes would need to be made to existing road layout and infrastructure to make this viable, with long term disruption to local residents.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO220	Andrew Lovatt	Policy SHA2: Strategic housing allocation land west of Fazeley	A ridiculous proposal for future residential development in the village of Mile Oak, completely out of proportion and out of character. It would place a terrible strain on local infrastructure. Resources and public services in Tamworth are inadequate even now, try registering with a GP surgery. Then add an extra 3,000+ residents to what was a rural village.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO221	Lorraine Allport	Whole document	Oppose the release of Green Belt in Burntwood. Road infrastructure will not cope, there are not enough places at local schools. It would see the loss of recreational space.	The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO222	Sharon and Geoff Chaplin	Policy SHA2: Strategic housing allocation land west of Fazeley	Objects to site SHA2 as it is in the Green belt and allocation for 800 houses is disproportionate to the existing area of Mile Oak. Green Belt Review 2019 only assessed a third of the site. Lichfield District Rural Planning Project September 2011 stated : " A area lying to the west of Mile Oak and Sutton Road would represent a westwards extension being the most distance from the principal area of facilities and services and for this reason it would seem to promote further dispersion of the community rather than contribute to any integration " Traffic congestion will be worsened by the proposal as well at the 750 homes at Dunstall Park and HS2 construction traffic. Cant see any information on implications on highway implications. Has a highway survey been carried out? Proposal will not improve existing communities of Mile Oak, Bonehill and Fazeley, there is no provision made for secondary school or support services. In previous plans this area was not considered appropriate because of the flood risk - has further research been carried out?	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.
LPRPO223	Yvonne Bird	Policy SHA2: Strategic housing allocation land west of Fazeley	Proposed allocations would increase already poor traffic situation in Fazeley. The development will also have a significant strain on local amenities.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO224	Rachel Stych	Whole document	Objects to any Green Belt development particularly in Burntwood, Chasetown and Hammerwich. Serves as wildlife corridor to many threatened species of bird and prevents towns from merging together. Loss of view for Hammerwich residents would be upsetting if land was developed by Norton Lane and Hospital Road because of the visual impact and the whole character of the existing neighbourhood would change.	The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO225	Patricia Williams	Whole document	Burntwood was once a thriving community that has since gone downhill, schools have been closed - there will not be enough places for the children who have the misfortune to live in one of these new houses. It is difficult to get a doctors appointment. The police station has closed down. Little seems to have been done to provide a shopping area on the land behind Morrison's. New residents will have to use cars as public transport is not great. People need open spaces to de-stress from hectic lives, we need facilities for families to enjoy. Council needs to look after existing residents rather than helping housing companies reap profit. Why cant brownfield sites be used, plenty are available in Burntwood.	The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO226	Mandy Dunning	Whole document	Objects to building proposals in Burntwood for following reasons: I will lose my view of the Green Belt There will be too much traffic There will not be enough facilities	The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.

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LPRPO227	Paul Green	Policy SHA2: Strategic housing allocation land west of Fazeley	This is the only main road connecting Sutton Coldfield with Tamworth. Over the past decade, the volume of traffic on the A453 has dramatically increased, producing very long traffic queues at the traffic lights with the old A5. It is not uncommon to experience traffic stretching back for several hundred yards in both directions. This situation will continue to get worse regardless of the proposed new housing development. The aforementioned traffic congestions will certainly increase the carbon and nitrogen oxide emissions to dangerous levels at peak traffic times. The road layout in Tamworth is typical of what was once a small market town having several arterial roads leading to a central location. The temptation to build high density housing along the arterial road has resulted in a short-term gain, and a long-term disaster. It has produced traffic congestions in all directions when trying to transit through the town.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO228	Ruth Cooper	Whole document	Acknowledge that any development proposals for this area are clouded by the fact that Hammerwich civil parish boundary extends beyond the village and surrounding rural areas, which includes valuable Greenbelt, into the Burntwood estates to the North of Hospital Road. I do not oppose all development but am strongly opposed to this proposal. Two of the purposes of Greenbelt are to check the unrestricted sprawl of large built up areas and prevent towns merging. 1300 homes and a 'new neighbourhood' certainly appear to fall within these parameters albeit Hammerwich is not a town. Secondly such development would contradict the guidelines laid down in sections 22.1 and 22.2 of the Lichfield Local Plan. Thirdly, where are all these people going to work without adding to the already heavy volume of traffic on surrounding roads in an area where public transport is currently little more than a skeleton service?	The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO229	Lynn Hill	Whole document	Inadequate infrastructure to sustain development. Downgrading land from green belt is not positive and should be preserved.	The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO230	Janet Beeston	Whole document	Objects to 1300 homes on site at Hospital Road and its removal from the Green Belt. Notification of proposal should have been sent to householders in area by post. Loss of Green Belt would destroy the rural setting of Burntwood. Will negatively affect house prices, meaning less equity in our property. In terms of infrastructure doctors and dentists are at capacity, school are full, bus service would need doubling. There would also be an increase in traffic noise. Amount of construction traffic around Haney Hay Road and Hospital Road would be totally unacceptable. Urban regeneration should be met by building on derelict or other urban land. Queries if the sloping field that has Crane Brook at the bottom is part of the proposal as there has been a lot of flooding there.	The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO231	John Emery	Policy SHA2: Strategic housing allocation land west of Fazeley	Main areas of concern regarding SHA2: Location is too far from main area of facilities and services, residents wouldn't be able to walk/cycle. Size of development is disproportionate to size of existing community. It will worsen existing travel congestion especially considering the 750 houses being built at Dunstall Park. the A453 is already congested and often gridlocked to Ventura - HS2 traffic is also on the A453 which will add to the congestion. Air quality will be impacted and the health of local people and wildlife. Impact on Tamworth - large strategic sites should be located closer to Lichfield not Tamworth - currently there is a shortage of healthcare, school places and support services - these will all get worse. Won't improve existing communities. Light pollution will increase. Public transport facilities are not good enough to accommodate increase in population. Loss of Green Belt - Green Belt Review 2019 only assessed one third of the site (FZ1).	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.
LPRPO232	Lewis Perry	Policy SHA2: Strategic housing allocation land west of Fazeley	Cannot see how the Fazeley and Mile Oak areas can take the extra traffic such a development would generate without resulting in extra traffic delays. With the 750 homes at Dunstall Park and 800 proposed at Mile oak, this could led to a further up to 3000 cars on local roads. What's more, a point will probably come whereby the hugely popular retail area of Ventura will become a no-go area for locals and potentially visitors due to congestion. This would be at odds with the sustainability statements made. There is a lack of overall infrastructure in the area. Another great concern I have is drainage. The ongoing works for HS2 on the A453 by Drayton Bassett road has already resulted in local flooding and mud from the fields along the road which is small in comparison to the proposed development of 800 houses and which will obviously have a larger effect on ground water during and after the development.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.

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LPRPO233	Terence Mason	Policy SHA2: Strategic housing allocation land west of Fazeley	The proposed allocation would exacerbate an existing traffic issue and would cause further disruption to residents alongside HS2. Services and infrastructure are at full capacity and cannot accommodate further growth locally. Overspill development from Black Country should be reconsidered.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO234	David Johnson	Policy SHA2: Strategic housing allocation land west of Fazeley	The environment and the green belt land are of paramount importance in this day and age. Furthermore a project of 800 dwellings giving very possibly 2000 more residents vehicles along with service vehicles and construction traffic is simply not feasible a view, I'm sure shared by every driver travelling this route and having to endure the massive queues and waiting times already currently existing. We simply do not have the infrastructure of roads, hospitals, school, doctors etc. to accommodate for any further development and pressure.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.
LPRPO235	Adrian Wiley	Policy SHA2: Strategic housing allocation land west of Fazeley	Congestion and traffic an issue. Concerns regarding the impact on schools/doctors/dentists/hospital appointments difficult to come by. Development would see a rise in crime and anti-social behaviour.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO236	Kerry Wilson	Policy SHA2: Strategic housing allocation land west of Fazeley	Strongly oppose the development plan to build 800 homes on Mile Oak green belt. Loss of privacy- my house would be over looked. Lack of amenities - I feel the town is already overcrowded with the shopping centres and supermarkets being fit to burst and very difficult to access. Highway safety and traffic generation/ pollution. The roads in Tamworth are extremely busy. The Sutton road is at times dangerously busy and I fear it would be extremely dangerous with the amount of new residents proposed. Loss of trees/ nature/ landscape. The Mile Oak green belt is a beautiful part of Tamworth and it will be devastating to lose it and all the trees and animals along with it. I feel the green belt is very important to the well being of Mile Oak residents. It would change the landscape of Mile Oak in a negative way. Amenities. I have no idea how another 800 families can be provided with jobs, school places, doctor and dentists. Not to mention accessing Ventura Park which is ridiculously busy. Also the through traffic for Drayton Manor and the snow dome. Devaluation of house.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.
LPRPO237	Sukeshi Thomson	Policy SHA2: Strategic housing allocation land west of Fazeley	Strongly oppose. From an environmental point of view and congestion and traffic problems. Difficult to get out of Gainsborough Drive in rush hour and more air pollution	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO238	Elaine Key	Policy SHA2: Strategic housing allocation land west of Fazeley	The proposed allocation would exacerbate an existing traffic issue and would cause further disruption to residents alongside HS2. Services and infrastructure are at full capacity and cannot accommodate further growth locally.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO239	J Richardson	Policy SHA2: Strategic housing allocation land west of Fazeley	I am against the building of 800 homes on the Mile Oak Green Belt land as that equates to 1600 vehicles (2 car families) using already congested Sutton Road and Bonehill Road pumping unwanted gases into the atmosphere. We need to keep all green belt for walks, the wildlife and clean air. We wish to express our concerns at proposed reduction in the value of Green Belt status in Hammerwich. We have seen the loss of almost all public services, the rail service, local buses, mobile library ,hospital, care home in adjoining Burntwood, local school and our Post Office. The only public services left is the street lighting and the occasional visit from the police.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.
LPRPO240	Vance Wasdell	Whole document		Comments relate to the Green Belt Review evidence. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO241	Walsingham Planning for Countryside Properties	Policy OSS2:Our Spatial Strategy	Proposed increase in housing numbers is welcomed and is considered necessary to meet projected levels of housing need and migration. However, concern that the proposed level of housing delivery will not actually be sufficient to meet identified needs in the District – with an urgent requirement for new affordable homes, elderly care provision and smaller housing types, as well as accommodating natural growth and overspill from neighbouring authority areas. It is not clear why – given the pressures to deliver a range of new homes within the District - the Preferred Options has adopted the minimum housing need figure.	Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review. The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO242	Walsingham Planning for Countryside Properties	Policy OHF1: Housing Provision	Consider there is scope for Fradley to accommodate additional housing provision beyond the 500 homes identified in Strategic Policy OHF1. There is an additional suitable, sustainable residential site on the edge of the settlement that could accommodate housing growth within the next 5 years, and it is considered that this should also be considered for allocation and is considered preferable to either release of the Green Belt at Whittington or a new settlement to ensure that the District's short and medium-term housing needs are addressed. The Council should be cautious about relying too heavily on very large strategic sites, which can be challenging to bring forward in a timely manner, and – as per paragraph 68 of the NPPF – a range of small and medium-sized sites can also make an important contribution to meeting the housing requirements of an area. Table 13.1 (Overall Distribution of Homes) in the Preferred Options only makes provision for 11,568 new homes on land proposed for allocation, representing a shortfall of 232 units against the identified level of housing need. Again, this would indicate that there is scope to include additional allocations within the new Local Plan in order to ensure that identified needs are suitably addressed.	A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements.
LPRPO243	Walsingham Planning for Countryside Properties	Policy SHA3: Strategic housing allocation land north and south of Hay End Lane, Fradley	Welcome the principle of allocating a new strategic site within Fradley, we consider that more suitable options are available that should be considered in preference to – or at least in addition to – the Land North and South of Hay End Lane. Land at Fradley Lane (site 66) is unconstrained by physical, heritage and environmental restrictions and is suitable and available for residential development. SHLAA assessment concludes that the site is available, suitable and achievable for residential development. Disagree with site selection paper, evidence provided. Site offers advantages over the land currently identified as a strategic housing allocation at Hay End Lane, in that the land at Fradley Lane is more urbanised (being enclosed by the A38) and so will not impact upon the village's rural hinterland and connections to local green infrastructure. The site is also less constrained by physical and environmental issues, such as flood risk, heritage assets and highways access, and – unlike the land at Hay End Lane – the site fully accords with the Council's preferred spatial strategy.	A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO244	Mrs D Mattison	Policy SHA2: Strategic housing allocation land west of Fazeley	Loss of large area of greenbelt land reducing the health benefits and increasing pollution and flooding. Traffic congestion Lack of infrastructure Limited affordable home provision	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.
LPRPO245	PA Maclean	Policy ONR1: Green Belt	We have watched over the years more and more houses being built in Burntwood without any supporting facilities. Burntwood facilities have been left behind, in fact ignored and forgotten in many ways, parking a traffic congestion are a prevalent issue. The council need to look after the residents it already has rather than helping housing companies and associated beneficiaries reap profit after profit after profit at our expense.	The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO246	Minna Andrews	Policy ONR1: Green Belt	Writes regarding the removal of Green Belt status at Land off Coulter Lane. The area is a desirable space for residents to walk, cycle and horse-ride as well as appreciating to the quietness and wildlife of the surroundings, the pleasant landscape and less-polluted fresh air. Once this has been built on the amenity is lost forever. There has to be a limit to any further increase in housing, as the population would require: Adequate transport infrastructure to cope with extra vehicles, increased policing, all age education requirements, medical facilities, leisure facilities as the main leisure centre is at the north-western side of Burntwood with little in the south-east apart from a swimming pool, general food outlets and supermarkets. Believes in the use of Brownfield sites and cites Olaf Johnson site as an example for housing. Suggests Queen Street where Bradbury and Brown site has stood empty and neglected for years. How can developing Coulter Lane be considered in light of the recommendations to exercise more and breathe less air pollution.	The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO247	M T McNally	Policy ONR1: Green Belt	Lack of infrastructure and facilities The housing proposed will not satisfy the government's requirements for inexpensive homes for those starting on the property ladder Brownfield sites should be investigated further as I believe there are sufficient brown field areas for our housing requirements. We know developers prefer greenbelt areas as it is easier and less expensive for them to develop. Burntwood Town Centre continues to shrink as a community facility and is now incapable of supporting the existing community let alone any increase in residential development. Loss of amenities	The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO248	Walsall Council	Chapter 7: Our Vision	Welcome that the vision now refers to having regard to the needs arising from within the housing market area. Support the need to release Green Belt land where supported by evidence.	Comments noted.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO249	Walsall Council	Chapter 8: Our strategic objective & priorities	Strategic objective and priority 4 (Our Infrastructure) should state "...regeneration initiatives on in these existing communities."	Noted.
LPRPO250	Walsall Council	Policy OSS2:Our Spatial Strategy	Black Country lacks the capacity to meets its own housing needs over the plan period. A high figure in Lichfield to contribute to these needs is therefore welcome. In the absence of a figure for future likely unmet need from Birmingham, the greater part of the additional housing should be attributable to the Black Country. The annual requirement in Lichfield's existing adopted local plan (478) and the actual annual delivery rate over the period 1998-2018 (382) are both substantially higher than the minimum local housing need calculated using the standard method (331). The proposed annual requirement for local housing need plus HMA contribution (536) would in fact be almost the same as the actual delivery rate over the period 2016-19 (538). Whilst it is useful for the supporting text to explain the origin of the proposed housing requirements, we would question whether the policy itself should state separate figures for the local requirement and the HMA contribution. Individual housing developments will not distinguish between those serving local needs and those serving the needs of the wider GBBC area.	Comments noted.
LPRPO251	Walsall Council	Policy NS1: New settlement	Question the need for the policy if not delivering in this plan period and are not changing the greenbelt boundary to accommodate it. In principle support looking towards a long term approach to accommodating development but until a location is fixed it is not clear what the implications might be for neighbouring authority areas.	The completion of a high quality new settlement is a significant undertaking which will take a number of decades to plan for and complete. A location will be identified through the plan making process through future reviews of the plan with associated opportunities to comment.
LPRPO252	Deannah Bennett	Whole document	<p>Objects to the removal of Green Belt status from land off Coulter Lane so it can be used for housing. Being able to walk through the local lanes has appealed to residents to build on the land would take away these healthy activities and would also increase traffic that the development would create.</p> <p>Surely the Council could fulfil its housing requirements using brownfield sites. Industry at Mount Road should maybe be moved to Chasetown Industrial Estate and release the land for housing. Blue Hoarding site adjacent to Morrison's could also de developed for housing as residents would be near Burntwood Bypass and have an easy exit out of Burntwood.</p> <p>LDC have taken the easy option to release Coulter Lane to generate large income from council tax.</p>	The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO253	Walsall Council	Policy OSC1: Securing sustainable development	Support the recognition of important sustainability issues, including reducing the overall need to travel and seeking to optimize the choice of means of travel. Support the references to the 'waste hierarchy' and the need to avoid sterilising mineral resources. Should signpost the Staffordshire Waste Local Plan 2013 and the Staffordshire Minerals Local Plan 2017 and explain how relevant proposal will be considered against the provisions of those plans.	Comments noted.
LPRPO254	Walsall Council	Policy OHF1: Housing Provision	Support the distribution of new homes primarily around the settlements in the district that are the largest (Lichfield) and or have the greatest potential for additional sustainable growth (Fradley). Recognise that the allocations at Fradley are in addition to allocations already in the existing Local Plan. No objections, but would point out that any further to the northwest of Fradley should not breach the line of the Trent and Mersey Canal, which forms a clear and defensible boundary to the area of search for sand and gravel west of the A38 (Inset 14 in the Staffordshire Minerals Local Plan). the plan does not propose any developments in the green belt on or close to the district's boundary with Walsall borough. We do not object to this. Indeed, in many cases, even if there was to be any development in the green belt in Walsall, the A452 Chester Road would provide a clear and defensible boundary. At present, the Black Country authorities are considering the needs for and appropriateness of potential developments in the Green Belt, and there are a few cases where the boundaries between the Walsall borough and Lichfield district might not be marked by major features on the ground. In such cases, we would welcome detailed discussions about where possible development allocations might be precisely begin or end. Initially, of course, these could be on a relatively informal basis, but we see that the local plan does envisage that detailed changes to green belt boundaries might be considered through future work on site allocations and / or plan reviews.	Comments noted. The Council will continue to engage with Walsall Council and the other Black Country authorities in accordance with our legal obligations under the Duty to Cooperate.
LPRPO255	Joan A	Policy SHA2: Strategic housing allocation land west of Fazeley	Concerns regarding loss of agricultural land and traffic congestion	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.

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LPRPO256	Barry Elliott	Policy ONR1: Green Belt	<p>Strongly objects to the removal of Green Belt status from land off Coulter Lane. Section 16 and 19 are at odds with each other with the Burntwood section stating high quality open spaces surrounding Burntwood will be enhanced and protected and Burntwood benefits from a rich natural environment which is important both locally and nationally.</p> <p>No justification has been given for the removal of Green Belt status removal.</p> <p>LDC seems to be ignoring the Burntwood Neighbourhood Plan "7. Protecting and Improving Access to the Surrounding Countryside Much of the local countryside is already protected in planning terms through policy such as Green Belt. This resource provides a semi-rural setting to the urban parts of the area and acts as a key area for informal recreation. Objective 6-To improve movement and accessibility around the area within a green environment. Objective 8-To protect and improve access to the surrounding countryside".</p> <p>Fears that building on Green Belt will impact on climate change and also our ability to become a nation which could potentially sustain itself in terms of food production.</p> <p>Consultation period of 8 weeks is too short.</p>	The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents. The consultation was conducted in accordance with the Council's adopted Statement of Community Involvement (SCI) which sets out how the Council will undertake consultations.
LPRPO257	Walsall Council	Chapter 13: Our Homes for the Future	The mix of dwelling sizes and tenures should have regard to the identified needs in the Black Country and South Staffordshire SHMA. Policy should explain the tenure mix (regardless of bedroom numbers) and whether the policy will only apply to developments of more than a certain number of dwellings.	Comments noted.
LPRPO258	Walsall Council	Policy OHF4: Affordable Housing	Should specify a figure below which any housing development should be refused unless viability evidence indicates that the required amount of affordable housing cannot be delivered. Government policy might mean it could be inappropriate for the policy to apply to very small developments and this should be clarified.	Comments noted. Further evidence in relation to viability will inform the Local Plan Review.
LPRPO259	Walsall Council	Chapter 14: Our economic growth, enterprise and tourism	Suggest adding requirement for sequential test to main town centre uses being applied to retail, leisure and employment sites. For consistency, with OEET2 the fifth paragraph of policy OEET1 should refer to B1(b)/(c) uses rather than just B1.	Comments noted.
LPRPO260	Walsall Council	Policy ONR3: Cannock Chase SAC and River Mease SAC	No objection and recognise the approach may be subject to alteration as a result of ongoing work.	Comments noted, the policy will reflect the latest and most up to date information and accord with the requirements and obligations in the Habitat Regulations.
LPRPO261	Surjit Kainth	Policy ONR1: Green Belt	Concerns regarding impact of amenity downgrading Coulter Lane Green Belt	The document identifies areas of 'Safeguarded Land' as defined within national policy. National policy states that consideration should be given that where changes to the Green Belt boundary are being proposed then areas of land between the urban area and the Green Belt (Safeguarded Land) should be identified to ensure the Green Belt boundary is capable of enduring beyond the plan period. The preferred options document identifies areas of such safeguarded land in conformity with national planning policy.
LPRPO262	Hazel Belcher	Policy ONR1: Green Belt	<p>Strong and continuing objection to remove land off Coulter Lane from the Green Belt Burntwood 2 and St Matthews 6. Direct opposition to vision for Burntwood. No mention of any exceptional circumstances to justify the removal of any land surrounding Burntwood from the Green Belt. There is sufficient previously identified land and brown field sites within Burntwood to accommodate all the housing needs for the natural population growth of Burntwood to 2040 and beyond. Blue hoarding is to be used for commercial building, providing extra shops rather than houses. If this is the case, the shops at Sankey's Corner could be relocated there and that area demolished, as it is in a poor state, with many shops already shut down, to allow residential properties to be built in place of the run down shops and car park. If LDC makes a determined effort to relocate businesses from out dated premises at Mount Road to more suitable sites in the Business Park close to Burntwood Bypass, there would be plenty of land to accommodate all the housing needs. However, the infrastructure must surely have to be improved and modified to allow for this growth.</p>	<p>The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.</p> <p>Proposals relating to the Green Belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.</p>
LPRPO263	Angela Turnbull	Whole document	Term safeguarded seems to imply "safety", but means the land can be built on at a later date! Need for 400 houses in the Burntwood area to meet allocation surely permission at Rugeley for 2300 this will compensate for this. Regarding the Green Belt, surely its sacrosanct once it's been built on for any construction, it's lost forever. It's a finite resource, it needs cherishing for our children our grandchildren.	The document identifies areas of 'Safeguarded Land' as defined within national policy. National policy states that consideration should be given that where changes to the Green Belt boundary are being proposed then areas of land between the urban area and the Green Belt (Safeguarded Land) should be identified to ensure the Green Belt boundary is capable of enduring beyond the plan period. The preferred options document identifies areas of such safeguarded land in conformity with national planning policy.
LPRPO264	Linda Whitehouse	Policy ONR1: Green Belt	Concerns regarding impact on local infrastructure	The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process
LPRPO265	Jessica Graham on behalf of The Crown Estate	OHF4: Affordable housing	<p>Has land interests land west of Lichfield City.</p> <p>Does not support the Council's proposed approach to seek affordable housing on each residential site to the highest level viably possible. Considers this approach will lead to significant delays in the application process as every residential applicant will need to negotiate its affordable housing position with the Council.</p> <p>Additionally doesn't consider this approach accords with para 63 of the NPPF which states affordable housing should not be sought on minor residential development. Requests policy is amended and affordable housing requirement percentage is proposed that is reasonable and fully justified.</p>	Evidence within the HEDNA suggests the Council will be justified in seeking to achieve as much affordable housing as viably possible on appropriate development sites. Further viability evidence is being collected which will inform the policy and provide a clear position in terms of the appropriate level of affordable housing to be sought.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO266	Amy Morgan	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>The proposal for new housing to be built is in a completely unsuitable area with accessibility issues</p> <p>The size of the development plan is disproportionate to the size of the existing community. Most of this provision will fall to Tamworth Borough, not Lichfield District which is not accessible and will impact on limited infrastructure and resources locally.</p> <p>There is a need to protect the countryside and SHA2 would have a negative impact on wildlife and biodiversity, especially along Bourne Brook. Furthermore, the loss of the green land would result in problems surrounding flooding in the area if it is being covered with concrete. Already water streams from the land onto the surrounding roads causing bad areas of flooding.</p>	<p>Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.</p>
LPRPO267	J Fulton	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>Traffic will increase significantly and is heavy all day. Residents struggle to get out of their drives. Development will have an unwelcome impact on this community. With HS2 and this development there will be an severe impact on the Green Belt. Loss of Green Belt in relation to climate change is in nobodies interest.</p>	<p>Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.</p> <p>Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.</p>
LPRPO268	Jessica Graham on behalf of The Crown Estate	Policy ONR1: Green Belt and Green Belt Review 2019	<p>Has land interest land west of Lichfield City. Policy ONR1: Green Belt proposes 3 "area of development restraint" which are proposed to be removed from the Green Belt and safeguarded for future development. Considers the approach accords with requirements of Para 139 of NPPF however does not support proposed location of Land at Fosseway Lane, Lichfield. Land being promoted by The Crown Estate is located within parcels L4-L8 in the Green Belt Review 2019 which have all been assessed as being 'important' in its contribution to purposes of the Green Belt. Does not support this assessment of these parcels and others around Lichfield due to inconsistencies in their assessment.</p> <p>Parcel L6 in Appendix D of the Green Belt Review is assessed as 'moderately' performing, but Table 3.8 states that it is 'important'. Requests Table 3.8 is amended to reflect its moderate performance. Once amended, Parcel L6 will be lower performing than Parcel L9 which is currently proposed as the Area of Development Restraint. Does not support the Council's approach that because part of Parcel L6 is historic parkland that it should continue to be within the Green Belt. Agree the parkland should be protected but clients site (SHLAA site 12) is not within the parkland and therefore should be considered for release from Green Belt. Once released from the Green Belt, the Western Bypass would from an appropriate revised Green Belt boundary in accordance with Para 139 of the NPPF.</p> <p>Does not support the findings of the Green Belt Review in regards to Parcel L8. Table 3.8 sets out the parcel performing an 'important' role against purpose 4 yet adjacent parcels L7 and L9 perform a 'moderate' role against this purpose. Parcel L8 is not adjacent to the City's conservation area and is adjacent to an allocation that is currently under construction (Site L5). Seeks clarity as to why the development of Parcel L8 would impact on setting, special character or historic features of Lichfield City whilst parcels L7 and L9 would not. Unclear how Parcel L15 and L13 perform minor roles against purpose 2 as development of the sites would result in Lichfield City being close to Whittington than development of parcels L7 and L8 would be to Burntwood. Unclear how parcel L9 scores 'moderate' against purpose 3 whereas parcel L4, L5, L7 and L8 perform an 'important role'. Parcel L9 is generally open land with little built development so requests justification from Council as to why it is only 'moderately' performing.</p> <p>Considers there are inconsistencies within the assessment of Green Belt parcels adjacent to Lichfield within the Green Belt Review 2019. Considers clients land to the west of Lichfield offers a more sustainable and suitable location for housing and its development will result in dispersment of growth across the City to ease the impact on existing infrastructure in the north east of the City.</p>	<p>Support noted. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.</p>
LPRPO269	Mr and Mrs K Grundy	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>Volume of traffic already alarming and lead to far more congestion. Can't turn right out of Gainsborough Drive at rush hour. Construction of HS2 will bring more issues. Frequent accidents. Not enough Local amenities- shops, schools, hospital. Not feasible for Tamworth to accommodate current housing never mind more. Needs a massive overhaul of road systems.</p>	<p>Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.</p>
LPRPO270	Matthew Pugsley	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>Mile oak junction already incredibly busy, ambulance route and further congestion could cause risk to life.</p> <p>Development at Dunstall Lane already will make situation worse. Too far from facilities and services at Fazeley, can't easily walk/cycle to anywhere. Would use schools, doctors, leisure etc. in Tamworth which are already strained. Loss of Green Belt not justified in GB review. Increase risk of crime, noise pollution, anti social behaviour. Size of development disproportionate to size of existing community. Loss of countryside, wildlife, biodiversity and landscape, loss of view for existing residents and access to walk over existing fields. Increase in light pollution with consequent negative impact on wildlife. Mile Oak prone to flooding this will escalate these risk. Disturbance to residents during construction. Will impact on quality of life should be closer to Lichfield.</p>	<p>Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.</p> <p>Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.</p> <p>. Impact on biodiversity will be mitigated.</p>

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LPRPO271	Jordan Wiley	Policy SHA2: Strategic housing allocation land west of Fazeley	Concerned relating the policy proposal regarding loss of privacy, traffic congestion, impact on local economy and job opportunities with more residents in the local area	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO272	Jessica Graham on behalf of The Crown Estate	Policy OSS2: Our spatial strategy	<p>Has land interests to the west of Lichfield City.</p> <p>Supports the Council's proposal to contribute dwellings towards the HMA shortfall, understands that the distribution of the shortfall has yet to be agreed between the HMA authorities and therefore the Council may need to provide additional dwellings at a later date to meet this need.</p> <p>Supports the proposal to release additional sites from the Green Belt (Areas of Development Restraint) and safeguard them for future development. Considers the ADRs could be used if the Council has to provide more than 4500 dwellings once the HMA authorities have come to an agreement.</p> <p>Supports hierarchy table within Policy OSS2 and the acknowledgement that Lichfield City is the most sustainable settlement within the District. Promoting clients land to the west of Lichfield (SHLAA sites 12.16, 17, 339 and 340). LPR proposes four strategic allocations across the District and in Lichfield City significant growth is proposed to the north east of the city centre. We do not support all of Lichfield's growth being directed to the north east of the settlement due to infrastructure capacity and delivery concerns. Therefore considers that growth should be directed to the west of the City in order to distribute the required growth.</p>	<p>Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review.</p> <p>The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period.</p> <p>Policy SHA1 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.</p>
LPRPO273	Mr and Mrs Hobbs	Policy SHA2: Strategic housing allocation land west of Fazeley	Oppose. Grave concerns regarding such a large development. Existing levels of traffic and congestion on an ambulance route. Turning out of George Avenue. Safety of Sutton Road for pedestrians. No safe access to bus stops on opposite side of Sutton Road from George Avenue, difficult for elderly and school children. Strain on local services - hospital, dentists, secondary school. Would need traffic calming, safe crossing points, footpaths. Mile Oak has no public open space, existing play area is dilapidated and littered with rubbish. As the proposed site is on the edge of the countryside then there should be ample space to incorporate areas for residents to use outside.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO274	Cathy Taylor	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>Impact on health service provision</p> <p>Active and sustainable transport - how is it going to be achieved</p> <p>The increase in traffic to the Mile Oak traffic lights is going to be a major issue. This junction is busy at any time of day and experiences major tail backs over the A5 island towards Tamworth during peak times.</p> <p>Delivering net gains in biodiversity- What biodiversity gains will be achieved? Are there examples of any similar developments producing biodiversity gains?</p> <p>Provision of open space as a public amenity and for health and wellbeing - The plan states there is a deficiency in provision and quality of the area's open space but doesn't detail how this will be addressed. Developing the centre Fazeley needs to be a high priority to regenerate the local area. The empty historic buildings would be stunning for accommodation and business use and bring life back to the area.</p> <p>The nature of the land to be developed means it will be incredibly difficult to produce a net gain for biodiversity with the development of a housing estate. The access to important green space for current local residents is going to be reduced. The rural nature of the land to the west of the Sutton Road will be invaded.</p>	<p>Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.</p> <p>Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.</p>
LPRPO275	Jessica Graham on behalf of The Crown Estate	Policy SHA1: Strategic housing allocation North of Lichfield	<p>Land interests to the west of Lichfield City.</p> <p>Considers the whole of Site SHA1 should not be allocated for growth within the LPR. Instead the site should be safeguarded for future development in order to allow for sufficient infrastructure to be implemented before an additional 3300 dwellings to the 1969 dwellings already allocated in the adopted Development Plan for this location.</p> <p>Council should look elsewhere in the city to deliver the required dwellings in this plan period. Promoting land west of Lichfield (SHLAA sites 12,16,339 and 340) and consider sites are in a sustainable and suitable location for residential growth and could be delivered within the Plan Period.</p>	Policy SHA1 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO276	John Francis DPP on behalf of FIREM (Drayton Manor Business Park)	Chapter 5: Profile of the district	Agrees with the council that it is an attractive location for people to live and work in. Large element of employment portfolio is old, outdated and in need of improvement or redevelopment so as to provide modern, fit for purpose floor space/units. Agree decline in traditional engineering and manufacturing this should be considered in context of growth in warehousing. Provision of superfast broadband is vital as it enables home working and mobile working but only serves some sectors. There is still strong demand for a range of employment units in a range of unit sizes across the district and especially in Fazeley. Agrees that the district's primary employment sector is 'wholesale and retail trade', followed by 'accommodation and food services. Often employment positions in these sectors is unskilled and low paid, whereas in other sectors, including light and general employment use/operations, which are involved in manufacturing, many positions are skilled or semi-skilled. As such the IOP should reflect that the new local plan should look to promote opportunities for better quality jobs. Noted that some local residents are employed in the professional, scientific and technical industrial sectors but have to travel beyond the district to access higher salaried jobs elsewhere. This reflects the availability of suitable sites/accommodation in the district, the creation of which should be a target of the new local plan.	Comments noted. Strategic Policy OEET1 seeks to continue to maintain and enhance the diverse local economy.
LPRPO277	Jessica Graham on behalf of The Crown Estate	Whole document	Crown Estate land being promoted for residential development located to the west of Lichfield. SHLAA Site 12 (Abnalls Lane, south of Shingle Cottage) – assessed as developable in the SHLAA for circa 19 dwellings. SHLAA Site 16 (Limburg Avenue, land east of Sandyway Farm) – assessed as developable in the SHLAA for circa 22 dwellings. SHLAA Site 17 (Walsall Road, Land at Hilltop Grange) – assessed as developable in the SHLAA for circa 250 dwellings. SHLAA Site 339 (Land off Abnalls Lane) - assessed as developable in the SHLAA for circa 383 dwellings. SHLAA Site 340 (Land north of Walsall Road) - assessed as not developable in the SHLAA due to uncertainty on how the site will be accessed. There is an existing access to the site which we consider could potentially be utilised to serve any future development of the site. Limited environmental and heritage constraints across the sites and subject to further detailed work, none of the constraints are expected to impact the sites ability to be developed for housing. Considers above sites are located within a sustainable location adjacent to the most sustainable settlement in the District and is deliverable within 0-10 years therefore should be allocated for residential development in the LPR.	Comments noted. A site selection paper discusses the approach to identification of proposed strategic sites. A suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements.
LPRPO278	John Francis DPP on behalf of FIREM (Drayton Manor Business Park)	Chapter 6: Issues	No direct interest in housing but core employment areas of the district should provide a range of housing opportunities to ensure that the local workforce can live within easy reach of where they work, which contributes towards sustainability objectives. Need to facilitate a wider range of employment opportunities within the district, which is noted as a key issue and policy should be included in future version of the plan. The provision of modern fit for purpose employment floor space/units will also assist in responding to changing demographics within our district, some positive some negative, but with regard to negative aspects it provides scope to address pockets of deprivation which exist within the district. To make the district more attractive and desirable place for business and enterprise to locate and invest in will require the provision of additional and better-quality employment development opportunities and related floor space and units and this could assist in reducing out commuting and reducing the need to travel.	Comments noted.
LPRPO279	John Francis DPP on behalf of FIREM (Drayton Manor Business Park)	Chapter 7: Vision	Supports the aspirations to deliver employment growth within the district and supports the release of Green Belt Land where evidence supports its loss, and broadly supports the creation of a new settlement, it remains of the view that a better, and more sustainable option, is to focus growth on an existing mid-range settlement like Fazeley, Bone Hill and Mile End, this because there is existing infrastructure, facilities, housing, employment (including DMBP) and opportunities for new housing and further employment and related infrastructure, all to be delivered sustainably, and while this will require some revisions to Green Belt, the overall impact on the district's Green Belt will be less than is currently being proposed.	Support noted.
LPRPO280	John Francis DPP on behalf of FIREM (Drayton Manor Business Park)	Chapter 8: Our strategic objectives & priorities	Surprised that strategic objective and priority 1 includes the desire to grow a number of our larger service village settlements to ensure they can become consolidated sustainable communities that meet the needs of our communities. This is because they offer less scope than larger settlements and as such this, least when expressed as a priority, should be a lesser one. By larger settlements we mean the likes of the main centre, Lichfield and second-string centres like Fazeley, Bone Hill and Mile End. Drayton Manor Business Park can help deliver this as it is removed from the Green Belt. Broadly supports the notion of accommodating substantial growth in a new settlement, but better option is to deliver a significant level of growth through the likes of a planned garden suburb/urban extension, the best options for which are roughly south of Fazeley, Bone Hill and Mile End, including being focused on DMBP, given its potential to deliver a major employment hub. Broadly supports strategic objective and priority 7 and 8 should be more specific on delivery, will require additional modern fit for purpose units which Drayton Manor Business Park can deliver if it is removed from the Green Belt.	Support noted.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO281	Jessica Graham on behalf of The Crown Estate	Policy OHF1: Housing Provision	<p>Land interests to the west of Lichfield City.</p> <p>Considers the 3,300 dwellings proposed to be allocated to the north eastern area of Lichfield City in addition to the 1,969 dwellings that are already allocated in the LPS and LPA documents will be a substantial amount of growth being placed on existing infrastructure in the north east of the city.</p> <p>Promoting land to the west of Lichfield (SHLAA sites 12, 16, 339 and 340). Consider growth should be directed to the west of the city in order to disperse development across the city. Clients land has limited environmental and heritage constraints and is in close proximity to public transport routes linking the land to the city as well as Cannock and Walsall. SHLAA sites 339, 12, 17 and 16 have been assessed as developable and could deliver circa 700 dwellings.</p> <p>Considers this land should be allocated for residential development to delivered within the LPR and the land currently proposed to be allocated for 3,300 dwellings should then be safeguarded for development as an 'Area of Development Restraint'. This site could the be released for development should any of the allocated sites fail to deliver dwellings. The proposed 'Area of Development Restraint' - Land off Fossey Lane, Lichfield should be removed from the LPR as although the SHLAA has concluded that the site is developable, it states that it is not 'suitable' for development (Site 2660).</p>	Comments noted. Policy SHA1 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO282	Mrs P James	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>Head teacher of Longwood Primary School, as a school welcome the opportunity to support new residents and welcome them into this thriving community.</p> <p>Longwood Primary School is a good school with capacity to increase its span to a two form entry school or three if required. Currently a one form entry school with capacity to take up to 210 pupils from ages 3-11. Also have a private run nursery on the grounds which would be able to support pupils age 2-3 years.</p> <p>Longwood has the capacity to bold/ expand the school to accommodate the additional housing which would be cost saving to the developers. There is a need for more housing in Mile Oak to support local people in being able to stay within the area. Mile Oak is convenient for people to commute to other areas. The only concern expressed to us is the volume of traffic but certain that traffic control is part of the development plan.</p> <p>New houses means new families which means a better economy for local business.</p>	Support noted. Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO283	John Francis DPP on behalf of FIREM (Drayton Manor Business Park)	Policy OSS2:Our Spatial Strategy	Support, but require land to be removed from the Greenbelt so opportunities such as Drayton Manor Business park can contribute to the growth of the District.	<p>NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.</p> <p>Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.</p>
LPRPO284	John Francis DPP on behalf of FIREM (Drayton Manor Business Park)	Policy NS1: New settlement	Supports the concept. However existing opportunities should be explored. Not support SHA2 and ONR1 strategy for Fazeley, not justified. Fazeley, Mile End and Bone Hill have potential to deliver substantial amounts of new development, including employment through releasing relatively small amounts of Green belt. Believe Drayton Manor Business Park shouldn't be in the Green Belt , shouldn't be included to the Green belt and has clear and significant potential for growth before the formation of a new settlement.	<p>NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.</p> <p>Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.</p>
LPRPO285	John Francis DPP on behalf of FIREM (Drayton Manor Business Park)	Policy OSC1: Securing sustainable development	Disagree. Should have a greater focus on sustainable development and the provision of new and or improved employment developments.	Strategic Policy OET1 supports proposals for new, or the expansion, conversion or redevelopment of existing employment premises.
LPRPO286	John Francis DPP on behalf of FIREM (Drayton Manor Business Park)	Chapter 12: Sustainable Transport	Lack of focus on the needs of employment sites and developments, including vis a vis good quality and reliable sustainable transport. Encourage the emerging local plan to look in greater detail at how services can be encouraged that support or provide access to existing well established and needed employment sites and opportunities like DMBP.	Comments noted. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO287	John Francis DPP on behalf of FIREM (Drayton Manor Business Park)	Policy ONR1: Green Belt	Agree need to make strategic changes to the Green Belt. Green Belt Review flawed. Area south of Fazeley, including DMBP has been assessed incorrectly. BA10 assessment ignore the significance of developed areas which hold no shared characteristics with rest of the area they have been assessed. Policy therefore unsound.	<p>NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.</p> <p>Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.</p>

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LPRPO288	Elaine Dorrington	Policy ONR1: Green Belt	There is sufficient previously identifies land and brown field sites within Burntwood to accommodate all the housing needs required. Impact on wildlife and ecology in the area. Burntwood has made no improvements to the infrastructure for over 20 years. R In my opinion I feel that Lichfield District council cannot give an honest and open reason as to why they want to remove this land from the Green Belt.	The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO289	Dorcas Batstone	Policy ONR1: Green Belt	The plan gives insufficient attention to the historic nature of Burntwood as a settlement and to its residents needs and desires to live close to attractive rural areas (a consideration the Council itself notes in relation to the district more widely). An option which focussed on the development of a new settlement would give the Council the opportunity to realise its aspirations for housing, infrastructure and employment without the present sticking plaster approach.	The completion of a high quality new settlement is a significant undertaking which will take a number of decades to plan for and complete. A location will be identified through the plan making process through future reviews of the plan
LPRPO290	John Francis DPP on behalf of FIREM (Drayton Manor Business Park)	Chapter 14: Our economic growth, enterprise and tourism	Policy restricts growth of DMBP. DMBP provides and excellent opportunity for growth and improvement. DMBP potential is restricted due to its inclusion in the Green Belt. In order for the policy to be effective it must look to allocate additional employment sites that have the potential to help the strategic growth within Lichfield.	Comments noted.
LPRPO291	John Batstone	Policy ONR1: Green Belt	The plan gives insufficient attention to the historic nature of Burntwood as a settlement and to its residents needs and desires to live close to attractive rural areas (a consideration the Council itself notes in relation to the district more widely). An option which focussed on the development of a new settlement would give the Council the opportunity to realise its aspirations for housing, infrastructure and employment without the present sticking plaster approach.	The completion of a high quality new settlement is a significant undertaking which will take a number of decades to plan for and complete. A location will be identified through the plan making process through future reviews of the plan
LPRPO292	Highways England	Chapter 13: Our homes for the future	The sites referred to as Lichfield City and Fradley are of a large scale, and given their location, can reasonably be expected to generate a significant quantum of traffic impacting on the SRN. It is possible that these sites will necessitate mitigation works relating to the A38 at Hilliard's Cross and Fradley Village junctions. Also, a wider extent of the SRN will need to be considered to identify the degree of traffic impacts and whether mitigation works will be required at additional SRN locations. The site at Mile Oak is of a large scale and located near both elements of the A5 Mile Oak junction. There is also interaction between the local road network junction known as Mile Oak crossroads (Hints Road/Sutton Road). Although expected to be on the local road network, careful consideration will need to be made of the site access/egress point(s) and any interaction with the SRN. Suitable transport analysis will be required in order to understand the implications for the operation of the A5, including the need for and form of any mitigation works. The site at Whittington, Huddlesford Lane is over 1 mile from the SRN and is of a modest scale, significant traffic impacts on the SRN are not expected, and no traffic assessment of this site is required. Other broad settlement locations and housing quantum need to consult HE at such time they are progressed in order that adequate consideration is given as to SRN impacts and any necessary mitigation. Given the broad location of the settlements involved and the associated development quantum's, this assessment approach (to consider at a later stage) is reasonable and appropriate for the majority of these broad settlement locations. However, at Burntwood, where some 400 homes are proposed potentially impacting on the A5, it is suggested that suitable transport analysis is carried out at this time based on potential broad locations of development. Generally, the council's overall commitment to sustainable communities and sustainable travel is welcomed. Continued positive engagement with Lichfield District Council and Staffordshire County Council (as local highway authority) is encouraged.	Comments noted. The Council will continue to engage with SCC and HE to ensure Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review.
LPRPO293	Highways England	Policy SHA1: Strategic housing allocation North of Lichfield	The sites referred to as Lichfield City and Fradley are of a large scale, and given their location, can reasonably be expected to generate a significant quantum of traffic impacting on the SRN. It is possible that these sites will necessitate mitigation works relating to the A38 at Hilliard's Cross and Fradley Village junctions. Also, a wider extent of the SRN will need to be considered to identify the degree of traffic impacts and whether mitigation works will be required at additional SRN locations.	Comments noted. The Council will continue to engage with SCC and HE to ensure the policies within the plan deliver the appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review.
LPRPO294	Highways England	Policy SHA2: Strategic housing allocation land west of Fazeley	The site at Mile Oak is of a large scale and located near both elements of the A5 Mile Oak junction. There is also interaction between the local road network junction known as Mile Oak crossroads (Hints Road/Sutton Road). Although expected to be on the local road network, careful consideration will need to be made of the site access/egress point(s) and any interaction with the SRN. Suitable transport analysis will be required in order to understand the implications for the operation of the A5, including the need for and form of any mitigation works.	Comments noted. The Council will continue to engage with SCC and HE to ensure Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review.
LPRPO295	Highways England	Policy SHA4: Strategic housing allocation land of Huddlesford Lane	The site at Whittington, Huddlesford Lane is over 1 mile from the SRN and is of a modest scale, significant traffic impacts on the SRN are not expected, and no traffic assessment of this site is required. Other broad settlement locations and housing quantum need to consult HE at such time they are progressed in order that adequate consideration is given as to SRN impacts and any necessary mitigation.	Comments noted. The Council will continue to engage with SCC and HE to ensure Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review.
LPRPO296	Highways England	Policy SHA3: Strategic housing allocation land north and south of Hay End Lane, Fradley	The sites referred to as Lichfield City and Fradley are of a large scale, and given their location, can reasonably be expected to generate a significant quantum of traffic impacting on the SRN. It is possible that these sites will necessitate mitigation works relating to the A38 at Hilliard's Cross and Fradley Village junctions. Also, a wider extent of the SRN will need to be considered to identify the degree of traffic impacts and whether mitigation works will be required at additional SRN locations.	Comments noted. The Council will continue to engage with SCC and HE to ensure Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO297	Phil Horton	Policy ONR1: Green Belt	Lack of infrastructure and facilities to accommodate growth.	The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO298	Sarah Weiss	Policy ONR1: Green Belt	Concerns regarding infrastructure, ecology and wildlife and traffic	The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO299	Fred Hopkins	Policy SHA2: Strategic housing allocation land west of Fazeley	Oppose. Impact of traffic on the already busy A453, very difficult to exit George Avenue. Increase in queues from A5. Loss of habitat for wildlife - otter, brown long eared bat, birds. Loss of access to the countryside, impact on landscape of old canal well estate, inappropriate development in the green belt. impact on water quality from sewage, can take 3 weeks to get a doctors appointment to add 1,600-2,000 patients onto and overload patients list is ridiculous.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.
LPRPO300	Delta Planning (Karin Hartley) on behalf of Prologis Ltd @ Fradley Park	Policy Chapter 14: Our economic growth, enterprise & tourism	Concerns regarding robustness set of policies within chapter, specifically within policy OEET1. We consider that Fradley Park offers the best opportunity for additional growth. Over the last two decades the area has grown into the main employment area in the District and the recent success of the Prologis development south of Wood End Lane has further cemented its credentials as being a highly attractive location for business. Further land is available south of the Prologis site (ELAA Site 65) and we submit that this site should provide a focus for further growth. The site comprises approximately 14.5ha of land and is being promoted by Prologis who has successfully delivered distribution facilities at the adjoining Prologis Park Fradley. The site is well contained and could be easily integrated into the existing employment park. Access could be provided via infrastructure delivered by Prologis as part of the adjacent employment development. In terms of technical issues, the site is unconstrained and available for development. The site falls within Flood Zone 1 (low risk) and is capable of being developed using sustainable drainage design. The site falls within the Cannock Chase SAC zone of influence, but is not covered by any other formal ecological designations at a local or national level. As with the completed developments at Prologis Park Fradley, it is considered that appropriate mitigation measures can be put in place to address any ecological impacts. It is considered that this site provides the best option for further growth at Fradley. It should be included as an employment allocation in the Local Plan Review to increase the supply of sites to meet employment land requirements and in particular the need for available sites of a sufficient size to accommodate strategic logistics occupiers in a location attractive to the market.	Comments noted
LPRPO301	Richard Pettitt on behalf of Keith Mallaber	Chapter 7: Our vision	Land interests at West of Fox Lane, Alrewas (SHLAA 127) Commends LDC for proactive approach towards progression and growth within the LPR. Positive wording of the Vision is supported by Mallaber Partners and is a significant improvement over the vision identified in the POPD consultation document. Vision goes on to identify that the need for private transport will be reduced through improvements to public transport infrastructure. However, encourages the Council to further consider the location of future employment, new and existing housing and the proximity between the two. To truly maximise sustainable transport opportunities, employment should be located within convenient distance of sustainable settlements and regular public transport linkages. The vision identifies that an element of Green Belt release is required to support growth aspirations, support the proactive approach to growth, but remind the Council that in order to justify Green Belt release, exceptional circumstances must be demonstrated. Para 137 of the NPPF notes that before exceptional circumstances can be demonstrated, all other options for meeting identified need must be examined. Suggests that sustainable larger service villages such as Fradley and Alrewas about areas of unconstrained land, reducing the need for any Green belt release.	Comments noted. Sites have been selected against the relevant evidences bases. The document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.
LPRPO302	Stafford Borough Council	Whole document	No comments on strategic housing allocations subject to appropriate mitigation for impacts to the Cannock Chase SAC being secured. Stafford Borough Council will continue to work with LDC as part of the Cannock Chase SAC Partnership. Note that areas to be removed from the Green Belt and safeguarded for future development needs t Burntwood, Fazeley and South Lichfield, future development on these sites would need to consider SAC mitigation. Wish to be kept updated on location for new settlement.	Comments noted - matters relating to ecology and biodiversity have been determined through the relevant evidence base and haven't taken impact on the SAC into consideration.

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LPRPO303	Cllr Susan Woodward	Whole document	<p>The town has long been promised improved infrastructure and services, few of which have been fulfilled. The town continues to see housing and (some) business growth but without the corresponding facilities to meet residents' needs which is exacerbated by additional housing development. Many houses have been built on infill and back land sites, all adding to the pressures on services and we are close to saturation point.</p> <p>Burntwood certainly needs improved retail facilities. We have a good network of local shopping areas (Chasetown High St, Swan Island, Sankey's Corner, Morley Rd and Rycroft) which are privately-owned but in need of additional investment. I would urge Lichfield District Council to explore ways in which these areas are supported and enhanced. A larger retail development on the former Olaf Johnson site is now on hold due to pressures on the retail market. I would also flag up the potential of Chasewater as a significant local asset to improve the health and wellbeing of residents but which needs far better access from the town including safe and user-friendly cycleway and car parking. Green Belt should be protected.</p>	Comments noted - The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process. Within Burntwood The document identifies areas of 'Safeguarded Land' as defined within national policy. National policy states that consideration should be given that where changes to the Green Belt boundary are being proposed then areas of land between the urban area and the Green Belt (Safeguarded Land) should be identified to ensure the Green Belt boundary is capable of enduring beyond the plan period. The preferred options document identifies areas of such safeguarded land in conformity with national planning policy.
LPRPO304	Richard Pettitt on behalf of Keith Mallaber	Chapter 8: Our strategic objectives & priorities	<p>Land interests at West of Fox Lane, Alrewas (SHLAA 127).</p> <p>Supports the overall aim of distributing growth to most sustainable locations and note that Fradley and Alrewas are identified as Larger Service Villages and have been apportioned a level of growth. Suggests that in order to maximise available opportunities and meet the needs of the community, additional employment should be provided in Alrewas in order to meet the needs of Para 104 of the NPPF - minimising the length of journeys needed for employment. This helps support Strategic Objective and Priority 5: Sustainable Transport.</p> <p>It is known that a new railway station is committed within the vicinity of Alrewas as part of growth in Fradley and growing visitor numbers at the National Memorial Arboretum, which will provide connectivity between Birmingham, Lichfield and Burton-on-Trent, and onwards to Derby, Nottingham. This is a significant step in enhancing sustainable transport linkages in the locality and should be considered a 'newly arising economic opportunity' as noted in Strategic objective and priority 7: Economic Prosperity. Priority 7 identifies the importance of adapting to changing economic circumstances and making the most of newly arising opportunities. This would be supported by additional employment provision in Alrewas.</p>	Comments noted with reference to employment this is an area of consideration further within the plan making process.
LPRPO305	Richard Pettitt on behalf of Keith Mallaber	Chapter 9: Our spatial strategy	<p>Land interests at West of Fox Lane, Alrewas (SHLAA 127).</p> <p>Supports the inclusion of Policy OSS1. Suggests that additional employment land at Alrewas could help deliver the aims of Strategic Policy OSS2 in providing employment in a demonstrably sustainable location, within the locality of a proposed railway station.</p> <p>OSS2 identifies the need to 'provide greater opportunities for high value employment within the district, including higher wage opportunities in growth sectors related to business'. The development of new office space will support this aim, as well as reducing the number of people who commute out of the district. The unconstrained location at Alrewas will also aid in the objective of protecting the Green Belt through reducing the amount released for employment purposes.</p>	Comments noted - Existing allocated employment areas are identified on the policies maps which accompanied the Preferred Options document. Current evidence suggests there are limited additional options for locating employment growth, this is explicitly referred to within the consultation document.
LPRPO306	Richard Pettitt on behalf of Keith Mallaber	Section 10: Our sustainable communities	<p>Land interests at West of Fox Lane, Alrewas (SHLAA 127).</p> <p>Strategic Policy OSC1: Securing sustainable development outlines the principles that all new developments should meet and contribute to. The proposed employment site at Alrewas would be able to meet all applicable facets within this policy while notably reducing the need to travel and optimising choice of active travel. The site could be accessed sustainably by both existing residents as well as a broader catchment area upon completion of the planned Railway Station. This principle is supported by paragraph 104 of the Framework which notes policies should 'minimise the number and length of journeys needed for employment'.</p> <p>The NPPF notes 3 central facets to sustainability, part 'a' identifies the economic objectives which include "ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure". Additional employment provision at Alrewas would support these objectives in full, helping to promote a sustainable economy</p>	Comments noted. Current evidence suggests there are limited additional options for locating employment growth, this is explicitly referred to within the consultation document.
LPRPO307	Richard Pettitt on behalf of Keith Mallaber	Section 12: Our sustainable transport	<p>Land interests at West of Fox Lane, Alrewas (SHLAA 127).</p> <p>Supportive of the objectives of Strategic Policy OST1: Our Sustainable Transport, which seeks to ensure that new development is accessible on foot, via public transport and other means as an alternative to private vehicles, in addition to reducing the overall need to travel.</p> <p>Suggests the inclusion of additional wording that states proposals able to meet and promote the sustainability criteria outlined in OST1 should be prioritised for development over alternatives. Encourages planned long term strategic transport links to be taken into account when considering the overall sustainability of a location to ensure the long term sustainability of a location is fully realised.</p>	Comments noted - will take potential additional wording for OST1 into consideration.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO308	Richard Pettitt on behalf of Keith Mallaber	Chapter 14: Our economic growth, enterprise & tourism	<p>Land interests at West of Fox Lane, Alrewas (SHLAA 127).</p> <p>Strategic Policy OEE1 notes that 'approximately 61 hectares of land will be allocated for employment uses, informed by the employment land availability assessment amongst other evidence. The 61ha requirement appears to be derived from the recommended level of requirement identified in the HEDNA undertaken in September 2019 by GL Hearn. Urges caution in adopting HEDNA 'midpoint' as there is significant evidence to suggest that the need is greater than 61ha. The HEDNA identifies that the figure may be as much as 144.6ha based on a past completions upper trend scenario, even a lower trend scenario identifies a requirement of 78.9ha over the plan period. It should also be noted that the HEDNA study is based upon a plan period up to 2036, this has subsequently been extended to 2040 which has not been reflected in the projected employment need.</p> <p>Based on these factors and Lichfield District's statement on a proactive approach towards growth, recommends a higher target for employment land and further site allocations in sustainable locations be considered. Strategic Policy OEE2: Our centres, identifies the settlement hierarchy and how the settlements will develop within the emerging Local Plan. Rural Centres are noted as settlements with day to day services which meet the needs of the village and wider rural area. This desire to meet local needs is reflected in the Local Plan review objectives which outlines the importance of Rural Centres providing shops, services and employment. Supports the sentiments of OEE2 and suggest that sustainable settlements such as Fradley and Alrewas identified for housing growth should accommodate appropriate employment development on unconstrained land to continue to meet these local needs</p>	<p>Comments noted. HEDNA is being update to reflect the extended plan period - figures will differ to previous publication.</p>
LPRPO309	Richard Pettitt on behalf of Keith Mallaber	Chapter 20: Larger Service Villages	<p>Land interests at West of Fox Lane, Alrewas (SHLAA 127).</p> <p>Supports the positive approach towards employment growth in Alrewas and suggest that the allocation of business use development to the south of Alrewas would help support the sustainability of the settlement within the adopted Local Plan, as well as its Parish including Fradley.</p> <p>Site at Fox Lane, Alrewas (SHLAA 127) is adjacent to the A38 Alrewas Village Junction, and Alrewas Village situated immediately north of the A513 which has good bus service provision and the site would have good cycle/ pedestrian access from the villages of Alrewas and Fradley, therefore the employment site could achieve a good level of sustainability.</p> <p>Site is within Flood Zone 1 and would not create increased risk of flooding or exacerbate flood land around it. Development would completely follow SuDs criteria and requirements. Foul water disposal would be either to public sewer network or new on-site bio disk treatment facility. A38 corridor has substantial utility network capacity.</p>	<p>Comments noted - Existing allocated employment areas are identified on the policies maps which accompanied the Preferred Options document. Current evidence suggests there are limited additional options for locating employment growth, this is explicitly referred to within the consultation document.</p>
LPRPO310	Burntwood Town Council	Policy INF1: Delivering our Infrastructure	<p>Lack of investment in infrastructure - health care, retail, school places are under increasing pressure. Public transport is now non-existent in some areas of the town. Burntwood is also clearly lacking in an identifiable well-developed town centre which could be seen as the location of community focus for events and facilities.</p>	<p>The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.</p>
LPRPO311	Burntwood Town Council	Policy ONR1: Green Belt	<p>Overwhelming desire of residents to see no loss of Green Belt, no exceptional case identified for change. Green Belt provides secondary function to maintaining boundaries of the town, it provides open space, enhances amenity and leisure opportunities of residents and visitors and is a haven for wildlife. Of the 5 primary purposes - it prevents coalescence, safeguards countryside (farmland, woodland, heath, AONB, SAC. Has rich history of mining town with its own character, large areas of brownfield in need of regeneration before Green Belt should be released, which are identified in the emerging Neighbourhood Plan. Neighbourhood Plan should form strategic basis of future development and be supported. Town Council accepts the requirements for additional housing but there are un developed and underdeveloped areas of land in the town boundaries to facilitate this. Town Council serves the whole town and it is imperative that a balanced view of the needs of the whole town and do not sacrifice one area to appease objectors to another. All Green Belt are not suitable for future provision and in particular affordable housing should be distributed across the town in suitable sites not just the western edge.</p>	<p>The document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice. The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents. The document identifies areas of 'Safeguarded Land' as defined within national policy. National policy states that consideration should be given that where changes to the Green Belt boundary are being proposed then areas of land between the urban area and the Green Belt (Safeguarded Land) should be identified to ensure the Green Belt boundary is capable of enduring beyond the plan period. The preferred options document identifies areas of such safeguarded land in conformity with national planning policy.</p>
LPRPO312	Burntwood Town Council	Chapter 19: Burntwood	<p>Needs of ageing population to down size as well as requirements for young people and families to have starter homes and affordable rental properties. Local Plan must ensure it is capable of delivering a sustainable community fit for the future generations and avoids destruction of the natural environment surrounding the town. Must give the relevant authorities the tools they need to deliver the aspirations outlined in the Local Plan and Neighbourhood Plan. There is no mention of the Town Deal agreement.</p>	<p>Evidence within the HEDNA suggests the Council will be justified in seeking to achieve as much affordable housing as viably possible on appropriate development sites, of an appropriate mix and range of tenure. Currently further viability evidence is being collected which will inform the policy and provide a clear position in terms of the appropriate level of affordable housing to be sought. Comments noted referring to Burntwood Town Deal which is a collaborative project between BTC,LDC an SCC.</p>
LPRPO313	Burntwood Town Council	Policy B1: Burntwood economy	<p>Please with B1 Burntwood should be seen as not just housing but business opportunities and associated employment being attracted to the town such as blue hoarding site and former trotting track at Chasewater which could accommodate businesses or an hotel.</p>	<p>Noted - Policy B1 is quite clear in its support for improving the local business opportunities and economy within Burntwood. Support will be given to growth of the town centre in order to meet local needs. The town centre will be promoted as an area of increased and more diverse economic activity, to include; new retail, employment, leisure, residential, recreation, health, and educational resources. The district council will encourage new retail development comprising both comparison and convenience floor space as well as leisure uses on the two key opportunity sites in order to, increase the attractiveness and market share of the centre to facilitate the delivery of a distinctive town centre.</p>

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LPRPO314	Burntwood Town Council	Chapter 16: Our natural resources	Chasewater excluded from our natural resources section and is of strategic importance for leisure wellbeing and tourism.	Comment noted.
LPRPO315	Burntwood Town Council	Chapter 12: Our sustainable transport	Imperative that provision of essential services is not just written into the local plan but is deliverable. OST2: Sustainable Transport only mentions Lichfield and doesn't mention Burntwood.	Noted - policy makes one reference to Lichfield City as a key public transport interchange which it is. All other elements reference district as a whole.
LPRPO316	Burntwood Town Council	Chapter 8: Strategic objectives & priorities	Welcome the strategic objective and priority to provide an enlarged and improved town centre. This should be supported by funding from LDC and SCC.	Noted - potential linkage with town deal mentioned above.
LPRPO317	Burntwood Town Council	Policy OHF1: Housing provision	Notes and acknowledges the responsibility in taking its share of the housing allocations, currently 838. This must compromise significant numbers of affordable housing. Not acceptable to have executive housing and developers reducing the number of affordable dwellings on brownfield sites to maximise profits. Executive homes do not address the needs of the community. Welcome figures for affordable housing in OHF2 would like to see more determination to deliver rather than 'seek to deliver' to ensure sustainability and balance across the needs of the community.	Noted - affordable dwelling provision to be addressed via the evidence within the HEDNA shaping affordable housing policy and provision.
LPRPO318	Burntwood Town Council	Policy OHF4: Affordable Housing	Policy should be more robust as developers are successfully arguing the case for reduced numbers of affordable housing.	Comments noted and reviewed - currently awaiting further evidence to shape policy further.
LPRPO319	Tom Piper Knight Frank B/O Piper Homes	Whole document	The overall direction of the Plan's vision and spatial strategy, particularly with regard to Little Aston being designated as a 'Level 3 – Larger Service Village' is largely supported. Consider the proposed Preferred Options Local Plan Review contains policies and supporting wording which are either unclear, not positively worded or fail to maximise the development and growth opportunities available.	Comments noted - phraseology of policies to be reviewed
LPRPO320	Tom Piper Knight Frank B/O Piper Homes	Policy OSS2: Our spatial strategy	Strategy to deliver a 'minimum' new dwellings plus a contribution of 4500 dwellings to 2040 along with the designation of Little Aston as a Level 3 service village is supported. However, despite the useful inclusion of a 'level hierarchy', no additional guidance is provided within the policy itself or the supporting wording which provides an indication of how the housing target is expected to be delivered and divided across the 5 levels. Housing targets should align more closely with policy OHF1.	Comments noted - the plan demonstrates the delivery through the 4 strategic allocations and within other settlements allocations through the neighbourhood plan process.
LPRPO321	Tom Piper Knight Frank B/O Piper Homes	Policy OHF1: Housing provision	Note there is a titling error with regards to table 13.1 quoted in paragraph two of the policy wording. Table 13.1 on page 57 is also labelled as Table 3.1, which is unclear and needs resolving. In addition, within Table 13.1 the total housing allocations for Lichfield city is miscalculated. Question why all other Level 3 – Larger Service Villages are specifically listed in table 13.1 and allocated housing targets except for Little Aston.	Comments noted - to be revised and corrected
LPRPO322	Tom Piper Knight Frank B/O Piper Homes	Policy OHF4: Affordable housing	Consider the Local Plan Review should acknowledge, identify and include the full the range of affordable housing tenures which are considered acceptable, including: Affordable housing for rent, starter homes, discounted market sales housing and other affordable routes to home ownership (See NPPF Clause 62 and Annex 2). Clause 63 of the NPPF states that provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer), however, Policy OHF4 also does not clarify the affordable housing provision threshold. Whilst we understand the council has a significant affordable housing need, we do not consider the current policy wording meets the NPPF soundness test. We consider the policy should set a minimum affordable housing percentage target on defined qualifying sites which is subject to viability.	Comments noted - re para 63 of the NPPF and threshold - threshold is currently specified within existing Local Plan. HEDNA will be used as key evidence to shape this further.
LPRPO323	Tom Piper Knight Frank B/O Piper Homes	Policy ONR1: Green Belt	Support the Council's acknowledgement that there is a strategic need to make changes to the Green Belt boundary to accommodate the growth, and further non-strategic changes to the Green Belt boundary which do not have a fundamental impact on the spatial strategy may be appropriate. With regards to the site comprising land off Walsall Road in Little Aston, the Lichfield Green Belt Review 2019 concluded that the site contributes a 'very limited role' to a number of the Green Belt purposes, wish to promote the site to be removed from Green Belt and the boundary to be revised via a non-strategic boundary change.	Comments noted - The Green Belt Review provides a comprehensive strategic assessment of all parts of the green belt and concludes which parcels may be most appropriate for release.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO324	Jessica Graham on behalf of The Crown Estate	Policy OHF2: Providing a balanced housing market & optimising housing density	<p>Land interests land west of Lichfield City.</p> <p>Does not support proposed approach to apply blanket density across the District on residential sites. Considers that density should be determined on a site by site basis. Considers that rather than proposing a blanket density of approximately 50 dwellings per hectare in sustainable locations and a minimum of 35 dwellings per hectare elsewhere, it may be more appropriate to state in this policy that "higher densities will be sought within sustainable locations which will be negotiated and agreed taking character areas, housing mix and the housing need into account at the time of the application".</p> <p>Policy should make reference to how density will be dealt with on phased strategic sites. In order to produced character areas on strategic sites, phases should be allowed to be delivered at different densities, for example higher densities around proposed neighbourhood centres and lower densities on edges of sites, as long as average density for the whole site meets the density agreed at outline application stage.</p>	Comments noted - will review, however character areas form part of masterplans within large scale strategic sites.
LPRPO325	Paul Clifford Green	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>Proposed additional 800 homes will result in an additional 1,120 vehicles most of which will transit through the traffic lights on the A453 which already creates very long queues. Suggests housing could be developed on large parcels of road from Hints Road through Plantation Lane to Lichfield Road in particular opposite Hopwas Woods which is waste lane. Development would allow direct access to Tamworth. Urgent need is for affordable starter homes.</p> <p>Traffic congestion will increase carbon and nitrogen oxide emissions to dangerous levels at peak times, the main offenders are slow moving and stationary traffic. A study should be undertaken by a recognised independent body to understand what the air quality will be if the development goes ahead.</p> <p>Using Green Belt for development should be a national integrated approach instead of solving problems on a micro scale. Building a completely new modern, carbon free town would be a better utilisation of Green Belt.</p>	Comments noted. Policy SHA2 includes requirement for appropriate infrastructure as part of the development of the site. The loss of Green Belt and countryside is justified through the evidence. The Green Belt Review provides a comprehensive strategic assessment of all parts of the green belt.
LPRPO326	Katherine Tierney	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>Objects to proposed development in Fazeley as it will put pressure on existing community facilities. Not enough primary or secondary school places, no doctors or dentists which will result in more pressure on Tamworth pressures.</p> <p>There is no public transport that would allow people to travel into Lichfield, plenty of land between Lichfield and Tamworth that could be used to save the burden landing solely on Tamworth. Already a large build up of traffic at rush hour a further 800-1600 cars will impact this detrimentally.</p> <p>Unemployment will increase in the area as no consideration has been given for where new residents are going to work.</p>	Comments noted. Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO327	Graeme Warriner (Barton Willmore LLP) on behalf of University Hospitals of Derby and Burton NHS Foundation Trust	Policy ONR1: Green Belt	<p>The hospital facilities should not be included in Policy ONR1 and instead should be removed from the Green Belt and form part of the Mile Oak settlement. Key aim of the Trusts is to ensure that any future enhancements / reorganisation of the medical facilities at the site are recognised and encouraged by the emerging Local Plan. As such, the Trusts seek that the Site is removed from the Green Belt designation, and included in the Settlement Boundary, thereby ensuring that policies positively support a presumption in favour of sustainable development and do not unnecessarily fetter the ability to develop the site and achieve improvements/enhancements. The Trusts are the sole owners of the site and are capable of bringing forward development promptly (e.g. within 5 years). As such, an identified development programme could take place in 2024, but preferably beforehand. As established through previous consultation, the removal of the site from the Green Belt is supported by the Trusts and the overall commitment to this release is therefore welcomed. However, disagree with the proposed timeframe of this release and do not consider the designation of the site as an Area of Development Restraint (as opposed to a full release of the Site from the Green Belt), to be justified.</p> <p>This is for the following reasons:</p> <ol style="list-style-type: none"> 1. Fetters the ability of the Site to realise health improvements or development opportunities in the short term 2. Green Belt Review evidence confirms Site does not contribute to Green Belt function 3. Site is sequentially preferable for Green Belt release compared to SHA2 4. Subdivision of ONR1 allocation would further support the release of the Site from the Green Belt <p>Overall, the eastern section of FZ9 (or Parcel F6 of the 2013/16 Green Belt Review), which includes SRPH and GBC, clearly comprises an area of previously developed land, which is significantly urban in its character. A position which is acknowledged by evidence. Its inclusion in the Green Belt cannot therefore contribute to a durable Green Belt boundary, as it contrasts strongly with the more open character of the surrounding area.</p> <p>To this end, and without prejudice to our earlier conclusions that the whole parcel should be released from the Green Belt in preference or alongside SHA2, we consider the justification is even more pronounced for the immediate release of the Site if the area identified in Policy ONR1 is subdivided into east and west parcels. The inclusion within the settlement boundary of the eastern part (SRPH and GBC) would provide a clearer, more durable and defensible boundary between the built limits of the Settlement and the Green Belt.</p>	Comments noted.

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LPRPO328	Marie Emery	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>Objects to 800 dwellings allocation in Fazeley for number of reasons: Not in suitable location - too far from main area of facilities and services. Will worsen traffic congestion - also 750 homes being built at Dunstall Park and HS2 construction alongside traffic from Drayton Manor and Ventura Park. New community would require new primary and secondary schools, support services, doctors, leisure facilities and utilities. Provision of this will fall to TBC and not LDC. Loss of Green Belt - Green Belt Review only assessed a third of the site. Size of development is disproportionate to size of existing community. Loss of countryside, impact on wildlife, impact on light pollution and rail service is already overcrowded.</p>	Comments noted. Policy SHA2 includes requirement for appropriate infrastructure as part of the development of the site. The loss of Green Belt and countryside is justified through the evidence.
LPRPO329	Jason Beeston	Whole document	<p>Objects to 1300 homes on site at Hospital Road and its removal from the Green Belt. Notification of proposal should have been sent to householders in area by post.</p> <p>Loss of Green Belt would destroy the rural setting of Burntwood. Will negatively affect house prices, meaning less equity in our property.</p> <p>In terms of infrastructure doctors and dentists are at capacity, school are full, bus service would need doubling. There would also be an increase in traffic noise. Amount of construction traffic around Hanney Hay Road and Hospital Road would be totally unacceptable.</p> <p>Urban regeneration should be met by building on derelict or other urban land.</p> <p>Queries if the sloping field that has Crane Brook at the bottom is part of the proposal as there has been a lot of flooding there.</p>	Comments noted - The Preferred Options document does not propose any new homes within the Green Belt at Burntwood/Hammerwich, . The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO330	Margaret Gardner	Whole document	<p>Strongly object to the removal of Green Belt status from land off Coulter Lane, Burntwood. Burntwood does not have the necessary infrastructure to support large scale housing developments such as doctors and schools. Building on Green Belt is not the way to develop affordable housing needs.</p>	Comments noted - With reference to this specific site the document identifies areas of 'Safeguarded Land' as defined within national policy. National policy states that consideration should be given that where changes to the Green Belt boundary are being proposed then areas of land between the urban area and the Green Belt (Safeguarded Land) should be identified to ensure the Green Belt boundary is capable of enduring beyond the plan period. The preferred options document identifies areas of such safeguarded land in conformity with national planning policy.
LPRPO331	David Cowley	Whole document	<p>Opposes building on the Green Belt land in Hammerwich/ Burntwood for a number of reasons; Traffic around Norton Lane, Hospital Rd, Ogleby Rd and Hannah Rd are already very busy - 1,300 extra cars will add to pollution and congestion Not enough schools to accommodate new children, junior and senior schools already have a waiting list. Haven't got enough doctors, no facilities for teenagers which will increase anti-social behaviour. Wildlife and their habitats will disappear.</p>	Comments noted - The Preferred Options document does not propose any new homes within the Green Belt at Burntwood/Hammerwich, . The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO332	David Walton (Whittington and Fisherwick Parish Council)	Policy SHA4: Strategic housing allocation land of Huddlesford Lane	<p>Parish Council notes the re-introduction of the site previously allocated at Land off Huddlesford Lane as part of the proposed strategic housing allocations for the District.</p> <p>Identifies serious issues relating to vehicular access arrangement for the site. Huddlesford Lane is extremely narrow making access to the site hazardous and impractical.</p> <p>Although site boundaries would be defined by existing hedgerows it is not obviously contiguous with the existing village edge and development here would undoubtedly impact on important inward views towards the village.</p> <p>Suggests if landowner and developers are still wishing to proceed, that serious consideration be giving to adopting the Back Lane site instead of Huddlesford Lane. The Parish Council maintains that this would be the least disruptive site.</p>	Comments noted. - Policy SHA4 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. In terms of highway safety and access evidence is being gather in collaboration with SCC Highways department.
LPRPO333	Cllr David Leytham	Policy SHA4: Strategic housing allocation land of Huddlesford Lane	<p>I speak as the District Ward Councillor and put a query from members of the public and the Parish Council in Whittington. You have chosen a site off Huddlesford Lane as your preferred option for development in Whittington. Why didn't you choose the large open site in Back Lane, behind the barn conversions, which seems to be far more suitable without any of the issues that concern the Huddlesford Lane site?</p>	Comment Noted - the site selection has taken into consideration a multitude of factors and evidence bases through the site selection methodology which sets out this process.
LPRPO334	Wilhelmina Fleming	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>Objects to the development of 800 dwellings due to the destruction of the environment and the natural habitats of the Otters in Bourne Brook, Barn Owls and Sky Lark alongside Sutton Road. The site is also Green Belt HS2 will also have an impact on this area.</p> <p>Traffic at Mile Oak is already congested outside of peak times. Sutton Road is also the main route to and from Good Hope Hospital for ambulances.</p> <p>Queries where rain water from new estate will go - streams at Bourne Brook would not be able to cope. Grey water and sewage will also be an issue as the present system cannot cope with the amount that will be produced.</p>	<p>Comments noted. Policy SHA2 includes requirement for appropriate infrastructure as part of the development of the site. The loss of Green Belt and countryside is justified through the evidence. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.</p> <p>Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.</p>

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LPRPO335	Eddie Earle	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>1. Green Belt has been so zoned over decades for a good reason, to control development to preserve the character of the country. This land is part of a particularly attractive local landscape that should be preserved as a visual asset to the area and not be allowed to spoil it.</p> <p>2. It forms part of an attractive countryside 'lung' between Tamworth and Sutton Coldfield that should be preserved.</p> <p>3. The highway infrastructure in the area is already overloaded at peak periods.</p>	<p>Comments noted - The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.</p> <p>Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.</p> <p>Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.</p>
LPRPO336	Pam Ayles	Policy SHA2: Strategic housing allocation land west of Fazeley	Increased vehicular congestion and traffic impacts. Lack of infrastructure within the local area. Detrimental impact upon Tamworth	Comments noted - Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO337	Muriel Buckley	Policy SHA2: Strategic housing allocation land west of Fazeley	Traffic congestion. Infrastructure at full capacity. There is very little green belt left around Tamworth and this new proposed development will reduce it even further. Houses along the Sutton Road will also have the blight of HS2. The disruption whilst the rail line is built across the Sutton Road will be horrendous - with more houses, it will cause unimaginable delays and holdups	Comments noted. Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO338	Louis Fleming	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>Objects to the proposal of 800 homes being built at SHA2 at Mile Oak for the following reasons;</p> <p>Infrastructure and Safety - can see no defined proposals to alleviate traffic issues and improve safety. A453 is the main route for the West Mids. Ambulance Service between Tamworth and Good Hope Hospital. Traffic is congested during rush hour, if there are any issues on the M42, A38 or A5 this overloads the capacity of the roads.</p> <p>Environment and Biodiversity - Building on SHA2 will create more surface flooding which will gravitate towards Western side of the area, Bourne Brook Cut will be affected by this both on the watercourse and the wildlife and further downstream. Otters, Kingfishers, a large number of birds, badgers, bats and owls are found in this area and are protected species, their habitat will be affected.</p> <p>Healthcare and Education - 5 local GPs in the area that already have large numbers of patients, increase of estimated 1,920 people from the development would put more pressure on the local healthcare system and hospitals and longer waits for appointments. 5 closest primary and secondary schools are limited with availability for school places with some over subscribed.</p>	Comments noted. Policy SHA2 includes requirement for appropriate infrastructure as part of the development of the site. The loss of Green Belt and countryside is justified through the evidence.
LPRPO339	Robin Stubbs	Whole document	<p>Welcome the recognition and strategic importance being applied to Neighbourhood Plans (NP) and roles they play in consideration of local planning and development alongside national policy supporting neighbourhood plans.</p> <p>Concerns that there is still no clear justification or verification of the Market Area contribution that LDC is proposing.</p> <p>Despite the postponement of a decision identifying the location of the 'New Settlement' which 'may take decades to plan for and complete' brings uncertainty. Green Belt areas should be protected.</p> <p>HGV movements within Shenstone need reducing, relocation of Shenstone's businesses using HGVs in more appropriate location within the district.</p>	Comments noted. The Green Belt Review provides a comprehensive strategic assessment of all parts of the green belt. The HEDNA provides evidence re the market area contribution. Evidence is being prepared by SCC regarding transport movements including HGVs
LPRPO340	Robin Stubbs	Policy NS1: New settlement	DC recognised the strategic importance and need to protect and safeguard the Green Belt, it should make a clear and unequivocal commitment in the report that any development for the future 'New Settlement' be made entirely outside of the Green Belt	Comments noted - the wording of this policy is to comply with the principles of the NPPF.
LPRPO341	Robin Stubbs	Chapter 13 : Our homes for the future	welcome the distribution and allocation for Shenstone as it aligns with the Shenstone NP. Outline planning permission has been sought to address this allocation for a mixed-use development (that meets Para. 13.5, Policy OHF2 and OHF4) at Shenstone Business Park (policy S1).	Comments noted and acknowledged

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO342	Linda Sproston	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>Objects to proposal to build homes on Green Belt land in Mile Oak for the following reasons; Land is Green Belt, areas of Green Belt already eroded as a result of HS2 construction. Traffic along A453 as Tamworth has expanded especially as a result of Ventura Park. 800 homes along with the 750 at Dunstall Park would exacerbate the situation further. Traffic lights at junction of A453 and B5404 have become an accident blackspot. Vehicles park on both sides of the road to the west of the A5 when using the Mercedes garage and the industrial estate, this will increase with another 800 vehicles using the road.</p> <p>No infrastructure is delivered with development proposals, . Proximity to Tamworth will only put more strain on their services in the town and not Lichfield. 35 years ago a referendum was held in Fazeley as to whether it should become part of TBC. Residents unanimously voted to stay with LDC because they felt it was the best chance of retaining the character of this area.</p> <p>Encouraged to protect the environment and eat locally sourced food yet agricultural land is being built on when there are brownfield sites in tones and cities that could be used instead.</p>	Comments noted. Policy SHA2 includes requirement for appropriate infrastructure as part of the development of the site. The loss of Green Belt and countryside is justified through the evidence. Furthermore, Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO343	Alan Castle	Whole document	<p>Note that in the Green Belt Review, which was one of the subsidiary documents which supported the proposal for the change, that the Primary Settlement of Armitage with Handsacre is subject to restrictions on available development land, caused by the northern boundary being impacted by the Trent Valley flood plain, the Trent & Mersey Canal, and the West Coast Main Line. This review also confirms that the southern boundary is defined green belt, and to that end, a review of the classification of said (x6) development areas has confirmed the importance of these six areas, which therefore makes development a challenge in the future.</p> <p>Currently, the capacity for any additional development is restricted also by a lack of any recent upgrade in infrastructure, and that our Neighbourhood Plan did not (and will not) state any development areas.</p> <p>We have therefore made the following assumptions in accepting the proposal. a) That the planning period is for 20 years from 2020 to 2040 b) That the total of 150 new homes does not include recent additions to planning permission (if this assumption is incorrect, please tell the Parish Council what the impact is on this total of 150 new homes) c) That the total of the new homes being brought within the Parish from the proposed Power Station development has not been considered.</p> <p>Would like to understand whether there will be any further review of the proposals in accordance with the requirement for Lichfield District Council to provide an additional 4500 new homes as part of the Birmingham demand.</p>	Comments noted - The Green Belt Review provides a comprehensive strategic assessment of all parts of the green belt. Green Belt Review 2019 makes clear that 'exceptional circumstances' would need to be demonstrated if changes to the Green Belt boundary are proposed. This has been judged to be the case in the preferred options document as stated at paragraph 16.5
LPRPO344	Neil Trollope on behalf of LSH Auto Properties (UK) Ltd	Policy ONR1: Green Belt Policy OEET1: Our Employment and Economic Development Green Belt Review 2019 (Table 3.5) Policy Map Inset 11	<p>LSH Auto Properties owns and operates the Mercedes dealership and adjacent commercial premises located at the A453/ B5404 junction in Mile Oak.</p> <p>The LSH site is located within parcel FZ2 in the 2019 Green Belt Review, which concludes that the parcel provides a 'minor' role in its contribution to the Green Belt. LSH supports this conclusion.</p> <p>Whilst all sites have been scored 'moderate for the fifth purpose of the Green Belt (to assist in urban regeneration, by encouraging the recycling of derelict and other urban land). Parcel FZ2 has an important role in contributing to urban regeneration. A significant part of the parcel is previously developed and is adjoined by main roads on three sides, and is located opposite Strategic Housing Allocation SHA2 which is proposed for removal from the Green Belt and allocated for approx. 800 dwellings.</p> <p>The SHA2 allocation (part of parcel FZ1) was assessed as having a 'moderate' contribution to the Green Belt, scoring a greater contribution to the Green Belt than FZ2. Therefore parcel FZ2 should be removed from the Green Belt at the same time as land allocated by SHA2. Alternatively, as a minimum, the Mercedes Benz dealership and other commercial uses adjacent to the A453/B5404 junction should be removed, with the remaining parts of parcel FZ2 considered for future removal through the subsequent allocations document, in accordance with Strategic Policy ONr1: Green Belt.</p> <p>Removing the existing commercial uses from Green Belt in this location will allow businesses to develop and modernise without significant constraint of Green Belt policy, thereby reflecting the strategic economic policy objectives set out in Policy OEET1.</p> <p>Policy OEET1: Our Employment and Economic Development should be amended to clearly state the Council will support proposals for new, expansion, conversion or redevelopment of existing employment premises outside those existing employment areas and allocated sites shown on local policies maps to be consistent</p>	Comments noted. Green Belt Review 2019 makes clear that 'exceptional circumstances' would need to be demonstrated if changes to the Green Belt boundary are proposed. This has been judged to be the case in the preferred options document as stated at paragraph 16.5. The Green Belt Review provides a comprehensive strategic assessment of all parts of the green belt. Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.

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LPRPO345	Ben Cook (Pegasus) on behalf of Wilson Bowden	Policy OSS2:Our Spatial Strategy	<p>The spatial strategy sets out that during the plan period to 2040 the Council will deliver a minimum of 7,282 dwellings plus a contribution of 4,500 dwellings towards meeting the GBBCHMA shortfall. The approach of delivering Lichfield District's objectively assessed need as a minimum figure in line with the standard method is generally supported. The pro-active approach taken to providing a contribution of dwellings towards the GBBCHMA shortfall is welcomed however, it is not clear how the figure of 4,500 dwellings has been identified.</p> <p>It is acknowledged that there is a separate draft policy regarding a new settlement and this is commented on separately. However, it should be clarified in SP OSS2 how the figure of 4,500 dwellings has been derived and what evidence this is based on as this has not been explained. The allocation of a housing development off Hay End Lane will be consistent with the objectives identified in the Neighbourhood Plan to provide for additional infrastructure and more particularly allow for the delivery of new sport and recreation provision.</p> <p>Support is given to paragraph 9.13 which recognises that development in Fradley provides the opportunity for a significant step change in sustainability particularly in terms of infrastructure provision. Again this is consistent with the vision set out in the Fradley Neighbourhood Plan.</p> <p>Paragraph 9.16 recognises that Fradley has experienced signification growth which has "to some extent" addressed the cohesiveness of the settlement. It is suggested that the text in the draft Local Plan is revised to specifically refer to land north and south of Hay End Lane being pivotal in the delivery of a more cohesive settlement, in that it would directly link the existing Fradley village area, the strategic allocation located north of Hay End Lane and the existing and ongoing development at Fradley south. In this regard the Hay End Lane proposed allocation is integral to the delivery of a more cohesive settlement pattern and in particular improvements to connectivity, which will allow for greater integration of the three components that currently exist at Fradley.</p>	<p>Comments noted - Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review.</p> <p>The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period.</p>
LPRPO346	Clare Orme (Fradley and Streethay Parish Council)	Policy SHA1: Strategic housing allocation North of Lichfield	<p>Fradley and Streethay Parish Council strongly objects to Strategic Housing Allocation SHA1 which would include a further 3,300 dwellings North of Lichfield. SHA1 falls within the Fradley and Streethay Parish boundary but this is not acknowledged by the LPR as Streethay is included as part of Lichfield. Concerned that there has been no previous discussion or consultation on this proposal. Not enough information provided within the LPR documents to allow for a fully informed conclusion on the viability or sustainability of SHA1.</p> <p>Fails to explain how local road network would cope with the development and the severe impact it would have on Fradley, Streethay or surrounding areas. Development would have severe impact on the A38 and no new junctions are proposed, also no direct route to Lichfield centre. Can assume that most of the traffic would come through Wood End Lane, which would already be used by the following developments: Curborough (750), Fradley SDA (700), proposed SHA3 (500). There is proposed increase of almost 2,000 homes to the traffic along Wood End Lane and accessing Hilliard's Cross Junction at the A38.</p> <p>Public transport would also be an issue, Trent Valley Railway Station is already being used to capacity, the three car parks provided are full most days with users of the train now parking around local streets causing issues for residents and businesses. Bus services are poor and would need to be improved if they are to service the projected growth.</p> <p>LPR states the proposed development would preserve and enhance the historic settlement. the Parish Council strongly disagrees with this as by reason of its massive scale and location would appear as an urban intrusion into a rural landscape. the proposal is unrelated to the existing settlement pattern and would serve to reduce the separation between Lichfield and Fradley even further.</p> <p>With housing already allocated within the Local Plan for Fradley and Streethay, along with a proposed further 3,300 dwellings, would mean that Fradley and Streethay Parish would be taking 48% of the whole Districts housing allocation. Development is not in line or supported by the made Neighbourhood Plan.</p> <p>Fradley and Streethay Parish Council would like to know the population projection for the area, the Master Plan for the area considering this LPR.</p>	<p>Comments noted. Further evidence is in process of collection and will continue to inform the emerging Local Plan Review</p>

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LPRPO347	Clare Orme (Fradley and Streethay Parish Council)	Policy SHA3: Strategic housing allocation land north and south of Hay End Lane, Fradley	<p>Fradley and Streethay Neighbourhood Plan states the requirement for dwellings suitable for the older generation to allow them to remain in the village. The Leavesley Planning Application goes a long way to delivering this aspiration.</p> <p>The Parish Council would only support a Master Plan if it gives the right level of infrastructure required. Would appreciate early input into this process to ensure the village has a say in possible benefits to come from the development.</p> <p>Parish Council requests a copy of the LDC Playing Pitch Strategy as the Parish currently has no sports provision. Considers that the Parish Council and Lichfield District Council needs to work together, along with the developers to provide a cricket pitches, football pitches and a sports centre for the community. Developers for the site would be happy to deliver this type of facility.</p> <p>Considers that the road network would require upgrades, that either Gorse Lane Bridge to be upgraded or a new bridge installed, or Common Lane would need to be extended to bypass Fradley South. This needs to be addressed at an early stage.</p> <p>Under the provision of infrastructure on page 111 it indicates a further Primary school should be on site, however the Parish Council does not feel this is required or desired for this development. St Stephens Primary school has recently been extended and a new Primary School is due to be delivered on the Bellway development due to open in September 2021.</p> <p>Parish Council would prefer road infrastructure to be considered as a priority followed by sports provision and housing provision for our aging population. If this can be provided then the growth to the village would be supported.</p>	Comments noted. Policy SHA3 includes requirement for development to provide appropriate infrastructure including access to the strategic and local highway network. Education and health infrastructure requirements related to strategic development proposals need to be understood. A Health Impact Assessment will be undertaken for sites requiring a masterplan with mitigation aligned to actions identified within the Council's Health and Wellbeing Strategy and the Physical Activity and Sport Strategy. District Council will promote the delivery of specialist housing for older persons through Policy OHF2.
LPRPO348	Sport England	Chapter 15: Our healthy & safe communities	Require clarity on difference between OHSC1 to OSR2. Welcome the establishment and enhancement of active travel networks reference should also be made to having appropriate infrastructure in place to support use of the networks i.e. lighting, fountains, toilets and seating area as per Sport England's Active Design Guidance.	Comments noted - will review against the relevant guidance. OSR2 focuses on the protection and provision of open spaces and recreation space within the district.
LPRPO349	Sport England	Policy OSR2: Open space and recreation	Require clarity on difference to OHSC1. Acknowledge evidence being prepared, findings should be incorporated into OSR2, setting out how development show developments will meet the demand identified and where relevant allocating new provision at the proposed housing allocation sites. Support policy as it seeks to protect all sport and recreation facilities that are identified in the Open Space Assessment reference should also be made to the emerging Playing Pitch Strategy. Support the creation of new open spaces, wording should be clear that this also applies to playing fields, sports and recreational buildings. To assist with the protection of recreational facilities and playing field land it is recommended that the agent of change principle contained within NPPF paragraph 182 is embedded into the policy. This would ensure that new developments do not impact / or result in the closure of recreational facilities and playing field sites, which are utilised by residents to undertake sport and physical activity.	Comments noted. Further evidence with regards for this will come from the emerging playing pitch strategy evidence.
LPRPO350	Sport England	Policy SHA1: Strategic housing allocation North of Lichfield	Support provision of a network of green space and delivery of sports pitches, play spaces. Advocate use of playing pitch strategy new development calculator.	Comments noted - will emerge through upcoming evidence
LPRPO351	Sport England	Policy LC3: Lichfield services and facilities	Supports initiatives to improve the quality and quantity of play spaces, amenity green space and sports provision. With regard to the provision of a new leisure centre the need should be established and supported by evidence.	Comments noted - evidence used to demonstrate such
LPRPO352	Sport England	Policy A1: Alrewas services and facilities	Support the delivery of sporting facilities with regard being had to the findings of the playing pitch strategy.	Comments noted
LPRPO353	Sport England	Policy SHA2: Strategic housing allocation land west of Fazeley	policy should explore the impacts of sports pitches and recreational facilities within Tamworth BC which could have increased use as a result of new demand generated from the allocation site.	Comments noted. Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO354	Ben Cook (Pegasus) on behalf of Wilson Bowden	Policy NS1: New settlement	It is acknowledged that in accordance with the Strategic Growth Study Lichfield District Council has indicated its support for a new settlement of around 10,000 dwellings within the District. The draft policy indicates that the location of such a settlement should be identified through plan-making and included within a subsequent review of the local plan. Whilst it is clear that the location of a new settlement should be identified through the plan-making process, it is not clear why this should be a matter for a subsequent review of the local plan.	Comments noted - The need for further clarification to be considered
LPRPO355	Ben Cook (Pegasus) on behalf of Wilson Bowden	Policy NS1: New settlement	Certain aspects of the policy as currently drafted should be refined. This wording is not clear and it is suggested should be clarified that its intention is that new development should not cause air quality standards to be exceeded.	Comments noted - wording to be reviewed
LPRPO356	Ben Cook (Pegasus) on behalf of Wilson Bowden	Policy OSC4: High Quality Design	Policy should be updated to reflect national design policy guidance. It is noted that masterplans are required for strategic developments (defined as over 100 dwellings) only. This approach is supported.	Comments noted - will be reviewed

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LPRPO357	Ben Cook (Pegasus) on behalf of Wilson Bowden	Policy INF1: Delivering our Infrastructure	<p>it is considered there needs to be additional evidence published in support of the Local Plan Review regarding infrastructure in order to provide clarity over what additional infrastructure is required to support the Local Plan Review allocations and how this will be delivered. This should include an update to the Infrastructure Delivery Plan (IDP) and further consultation with the County Council and other relevant consultees on matters such as highways modelling and education provision. The delivery of growth and associated infrastructure can only occur if proposals have been properly assessed for viability.</p> <p>The approach of allocating the allocation of "non-strategic" sites to Neighbourhood Plans is not supported. This approach is not consistent with national policy. In order to comply with this, the Plan should at least identify broad locations for growth for the settlements to allocate through a Neighbourhood Plan or identify specific allocations.</p> <p>Total housing allocations identified provide 11,568 new dwellings. It should be clarified in the supporting text if the balance is to be made up via windfall developments and, if so, how these assumptions have been arrived at. The policy also emphasises the re-use of brownfield land. The evidence to demonstrate the capacity of brownfield land in the District should be referenced.</p>	Comments noted. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process. This is still ongoing.
LPRPO358	Ben Cook (Pegasus) on behalf of Wilson Bowden	Policy OHF1: Housing provision	<p>Plans is not supported. This approach is not consistent with national policy. In order to comply with this, the Plan should at least identify broad locations for growth for the settlements to allocate through a Neighbourhood Plan or identify specific allocations.</p> <p>Total housing allocations identified provide 11,568 new dwellings. It should be clarified in the supporting text if the balance is to be made up via windfall developments and, if so, how these assumptions have been arrived at. The policy also emphasises the re-use of brownfield land. The evidence to demonstrate the capacity of brownfield land in the District should be referenced.</p>	Comments noted. The District Council has identified strategic sites within the Preferred Options document based upon a range of evidence. The site selection paper provides detail of the approach taken.
LPRPO359	Johns Adams on behalf of Lichfield Rail Promotion Group	Chapter 7: Our vision	<p>Considers that the delivery of 4500 dwellings to meet Greater Birmingham and Black Country shortfall is inconsistent with Strategic Policy OSS2: Our Spatial Strategy... "to reduce out-commuting". People moving into the area will then commute back out to their place of work unless known work is available for workers from Greater Birmingham and the Black Country.</p> <p>Recommend that the final plan needs to explain the rationale for increased numbers and how the Council aims to be consistent in its aims to reduce out commuting and where jobs are for additional numbers.</p>	<p>Comments noted - A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.</p> <p>Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review.</p> <p>The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period.</p>
LPRPO360	Ben Cook (Pegasus) on behalf of Wilson Bowden	Chapter 13: Our homes for the future	<p>Wilson Bowden Developments are concerned that in its current form this policy, by referring to specific percentage figures, lacks sufficient flexibility to meet changing housing needs across the District and across the plan period. It is submitted that the most appropriate approach to housing mix is to continue to be guided by market signals, as defined with the most up-to-date Strategic Housing Market Assessment (SHMA). The SHMA should be routinely updated across the plan period which will ensure that housing mix is reflective of market need.</p> <p>In seeking to specify a mix, the policy lacks flexibility to reflect differences across the sub-market areas; changing needs over the plan period and site-specific considerations which will often influence the mix that can be delivered on individual sites.</p> <p>The policy also sets out minimum net density of 35 dwellings per hectare. This is considered to be appropriate. Developments in Lichfield City, Burntwood Town and locations with good public transport links will be expected to achieve higher densities of approximately 50 dwellings per hectare.</p> <p>The Policy also identifies that the final housing mix can be considered against 6 specific bullet points. Concern is raised over the nature of the bullet points and their failure to reflect on the characteristics of certain key settlements including Fradley.</p>	Comments noted - SHMA continues to be updated annually. Housing mix comments noted to be reviewed.
LPRPO361	John Adams on behalf of Lichfield Rail Promotion Group	Chapter 13: Our Homes for the Future	<p>Highest number of homes shown in this section is in Lichfield but approximately a third of developments already agreed will be outside of the South Lichfield bypass and more than a mile to the nearest train station.</p> <p>In Fradley where over 1700 additional homes are planned, public transport is woeful, and access to/from the village from the A38 is dangerous. It is unclear how these existing approvals will benefit from public transport.</p> <p>Recommend that the plan includes specific reference to how new homes already earmarked for Lichfield and Fradley will access public transport, in particular existing and necessary additional services.</p>	Comments noted - Policy SHA3 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO362	Ben Cook (Pegasus) on behalf of Wilson Bowden	Policy OHF4 : Affordable housing	<p>As presently drafted, this policy does not yet set an affordable housing rate and instead seeks affordable housing on each housing development to the highest level viably possible. National policy clearly requires a Local Plan to set an affordable housing requirement which this policy currently lacks. The policy should be amended to state an affordable housing percentage requirement. This should be subject to viability testing to confirm an appropriate figure. The initial viability evidence indicated that 0%, 20%, 30% and 40% would be tested on major development sites. This evidence has determined that a figure of 40% is unlikely to be viable.</p> <p>The policy also seeks to allow flexibility in the tenure, size and type of affordable housing on a scheme by scheme basis. This flexibility is supported and should be delivered with reference to the most up-to-date Strategic Housing Market Assessment (SHMA).</p>	Evidence within the HEDNA suggests the Council will be justified in seeking to achieve as much affordable housing as viably possible on appropriate development sites. Further viability evidence is being collected which will inform the policy and provide a clear position in terms of the appropriate level of affordable housing to be sought.

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LPRPO363	John Adams on behalf of Lichfield Rail Promotion Group	Policy OST1: Sustainable Transport Strategic Objective and Priority 5: Sustainable Transport. Vision Statement	<p>Welcomes commitment to securing improved public transport but cannot find any specific reference as to how this will be achieved - in particular the re-opening of passenger services between Lichfield and Burton/Derby, and westwards to Walsall/ Wolverhampton which would serve Burntwood. Additionally there is no specific reference to how bus services may be improved in particular to connect with existing rail services, and the necessary new lines. Recommend that these omission are rectified in the published version of the Plan.</p> <p>Believe that their should be closer contact with adjoining councils in Walsall and East Staffordshire, and active discussion with Network Rail and West Midlands Rail Executive to promote the need for the introduction of rail services between neighbouring communities. Economically and environmentally improved rail provision is vital to meet the continuing increased growth that the District expects to see.</p>	Comments noted - infrastructure provision of this nature requires cross organisation working. Evidence is still being collected and coordination with relevant infrastructure providers ongoing.
LPRPO364	Sport England	Policy NS1: New Settlement	<p>Need to ensure that the settlement has sufficient green spaces, indoor and outdoor sports facilities to enable for the choice and chances for all to live a healthy life. Will need up to date evidence at the appropriate time and potential impact upon neighbouring authorities indoor and outdoor sport depending upon the location. Guidance available.</p>	Comments noted. - guidance welcomed.
LPRPO365	John Adams on behalf of Lichfield Rail Promotion Group	Policy INF1: Delivering our infrastructure	<p>Suggests amended policy wording</p> <p>The current policy states "The District Council will collaborate with other strategic policy making authorities to ensure that administrative boundaries do not restrict the delivery of the most appropriate infrastructure response".</p> <p>Recommends that this should read ".....collaborate with neighbouring strategic policy-making authorities to achieve an integrated approach to infrastructure delivery, in particular, the need for integrated public transport throughout the district and the neighbouring authorities."</p>	Comments and rewording noted
LPRPO366	Ben Cook (Pegasus) on behalf of Wilson Bowden	Chapter 16: Our Natural Resources	<p>The approach to habitats and biodiversity is generally supported where it is consistent with national policy. Policy ONR5 addresses natural and historic landscape. In Lichfield District, there is one area of landscape which is nationally valued; Cannock Chase Area of Outstanding Natural Beauty (AONB). The policy focuses on the AONB however it also references the West Midlands Green Belt. It is contended that Green Belt is not a landscape designation and is not a 'valued' landscape1. It is therefore not clear why this policy makes reference to the Green Belt and should focus on the AONB and its immediate surroundings. Any policy text regarding beneficial use of the Green Belt should logically be included in the Green Belt policy</p>	Comments noted - will review element referencing Green Belt and relevant evidence.
LPRPO367	Ben Cook (Pegasus) on behalf of Wilson Bowden	Policy OHSC1: Our healthy & safe communities	<p>The approach to healthy and safe communities in Policy OHSC1 is generally supported. However, the policy states that health and education infrastructure requirements related to strategic development proposals will need to be understood and determined through the Local Plan and accompanying evidence base so that it is clearly demonstrated that the strategic allocations are deliverable. Infrastructure requirements for strategic sites will also need to be considered by the viability process.</p>	Comment noted - The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO368	Ben Cook (Pegasus) on behalf of Wilson Bowden	Chapter 20: Larger service villages	<p>Fradley comprises of three distinct areas, this section should also recognise that there remains a need to knit these three areas together to provide a cohesive settlement and the Hay End Lane allocation is the key component in delivering this overarching objective. Connection with Policy SHA3 there are elements of the infrastructure provision in particular that do not appear to be evidenced or justified. The vision statement should also be revised to make reference to the allocation comprising of 750 dwellings rather than 500 as drafted.</p>	Comment noted - Policy SHA3 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO369	Ben Cook (Pegasus) on behalf of Wilson Bowden	Policy SHA3: Strategic housing allocation land north and south of Hay End Lane, Fradley	<p>The Policy introduces the concept of providing masterplan for the whole site. No objection is raised to this requirement and in fact an initial concept framework has been produced jointly between both of the landowners for the allocation site.</p> <p>This concept framework is included with these representations at appendix 1. As a result it has been shown that these proposals can be successfully integrated to provide a suitable extension to Fradley which would deliver the cohesiveness needed to improve the settlement as a whole. No objection is raised to the majority of the design principles identified in the Policy. One of the design principles refers to addressing climate change and delivering a net zero development by 2050. Further explanation is needed in regard to how these issues would be reconciled in a Plan running to 2040.</p> <p>Again the majority of the bullet points highlighted under the heading 'infrastructure' are supported. Reference to a new primary school on site, however, has not been evidenced. In particular it is notable that the existing St Stephen's school site is located in close proximity to the new housing location whereas Policy SHA3 suggests another primary school should be provided. Considered a lack of evidence to support the need for a further primary school it is suggested that the Policy is amended to remove reference to the provision of a further school, but could include reference to contributions towards commensurate improvements to education facilities.</p>	Comments noted - Policy SHA3 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO370	Ben Cook (Pegasus) on behalf of Wilson Bowden	Policy FR2: Fradley services and facilities	<p>The first line of the Policy states support will be given to the delivery of primary healthcare provision which identifies local need and requirements set out in strategic policy OHSCI1. It is unclear what this sentence means in association for development at Fradley in terms of what the provision will consist of, where it will be located and how it would be delivered. Policy is not clear about whether this remains the strategy or whether provision will be made within the village itself nor how that would be funded.</p> <p>The second paragraph of Policy FR2 refers to exploring all options to ensure improvements to the Hilliard's Cross and Fradley village junctions on the A38. It is assumed that these improvements will be required to mitigate the effects of the proposed Hay End Lane allocation. If this is the case the Policy should be amended to refer to the proportionate and necessary improvements to the junctions based upon the need to mitigate the impact of the Hay End Lane allocation.</p> <p>Policy FR2 should recognise that some services and facilities can only be delivered when sufficient population is present to support such a proposal and will be dependent on market demand. This should be made explicit within the requirement for this facility.</p> <p>Paragraph 20.41 in the explanation states the Council are currently completing, in partnership with Highways England, modelling which will identify mitigation measures for the junctions along the A38. These measures will need to be delivered as part of the plan process. The explanation needs to make more explicit that the new allocation will only be mitigating the impact of the proposed development.</p> <p>Paragraph 20.43 reiterates the point that Fradley has three distinct elements and it is important that these three parts are brought together and consolidated to create one cohesive community. Again the explanation would benefit from reference being made to the Hay End Lane allocation being the key component in delivering this overall objective.</p>	Comments noted - appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. Evidence relating to transport infrastructure is still being gathered.
LPRPO371	Anthony Watkins	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>With regard to the consultation, I do fear that the whole story has not been told. Whilst it talks about 800 homes in the Mile Oak area adjacent to the Sutton Road, it does not mention the 750 houses that are planned for the area adjacent to Plantation Lane and Dunstall Park.</p> <p>Looking at the draft plan, I note that LDC is needing to provide 7300 homes for its own projected needs and a further 4500 for a shortfall from Greater Birmingham and the Black Country. Whilst not wanting to be parochial, surely Greater Birmingham and the Black Country can't just offload its shortfall onto a neighbouring community. There must be plenty of brownfield and greenfield sites in Greater Birmingham and the Black Country that are in need of development/redevelopment rather than lose precious greenbelt areas for ever by turning them into housing?</p> <p>Anybody who knows Fazeley and Mile Oak will know that over just the last few years, road congestion has increased exponentially. As recent as three years ago, the arterial routes into the Town from the South and West were uncongested and flowed freely. Fast forward just three or so years and the landscape has significantly changed. The A5 where it meets the traffic island at Fazeley and onto Two Gates is heavily congested at rush hour resulting in the traffic island often being gridlocked by traffic both joining from Drayton Manor and traffic in the opposite direction coming out of Town. Up the A5 at Mile Oak, a similar situation is in play. At rush hour now, traffic from the Mile Oak Traffic lights backs up along the Sutton Road often as far as Bangley.</p> <p>The 2040 proposal talks about the provision of a new primary school for Fazeley. There is no mention of Doctors surgeries, Clinics, a new Secondary School etc. that this size of development would need as the current infrastructure cannot cope.</p> <p>The size of the proposed development, when looked at on an OS map, will dwarf the existing Mile Oak and Bonehill settlements as well as most of the Fazeley settlement. This will destroy the character of the local community. In summary the proposal will not enhance the quality of life of local residents.</p>	Comments noted. Policy SHA2 includes requirement for appropriate infrastructure as part of the development of the site. The loss of Green Belt and countryside is justified through the evidence
LPRPO372	Naomi Light Leavsley Group	Chapter 7: Our Vision	<p>The Vision for the district stance on growth and its importance in the development of the District. The delivery of a new settlement would be the most efficient, sustainable and appropriate way to meet these requirements. Paragraph 72 of the framework identifies that provided it is well located, designed and supported by appropriate infrastructure, supplying large numbers of homes can often be best achieved through a new settlement. The site at Brookhay is not affected by any statutory constraints or designations and will benefit from the development of a new Railway Station, enhancing sustainable travel connectivity. Vision identifies that the need for private transport will be reduced through improvements to public transport infrastructure. This reflects the objectives noted in Section 9 of the NPPF which identifies the importance of maximising sustainable transport opportunities. Support the proactive approach towards growth, we remind the Council that in order to justify Green Belt release, exceptional circumstances must be demonstrated. Suggest that sustainable Larger Service Villages such as Fradley abut areas of unconstrained land, able to accommodate sustainable growth, avoiding the need for any Green Belt release in the provision of a new settlement.</p>	<p>Comments noted -The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.</p> <p>Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.</p>
LPRPO373	Naomi Light Leavsley Group	Chapter 8: Our strategic objectives & priorities	<p>Strategic objective and priority 1: Sustainable communities, describes the overall growth ambitions of the District and how this will be achieved sustainably. New homes and infrastructure will be brought forward in large settlements in the short term with long term aspirations reliant on the delivery of a new settlement. The proposed new settlement at Brookhay will benefit from linkages provided by the new Railway Station planned within the locality, supporting Strategic objective and priority 5.</p>	Comments noted

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO374	Naomi Light Leavsley Group	Policy OSS2: Our spatial strategy	<p>The Leavesley Group support the inclusion of Policy OSS1 which seeks to implement in policy the presumption in favour of sustainable development identified within the NPPF. Strategic Policy OSS2: Our spatial Strategy, identifies the settlement hierarchy used to inform the Local Plan Review and the broad direction of future growth.</p> <p>NS1 notes that the new settlement location will be identified through a future review and commence delivery towards the end of the 2040 plan period and continue to contribute to growth in the district beyond the plan period. The new village will accommodate approximately 10,000 dwellings and be self-sustaining with a range of employment and recreational facilities. The settlement location must be well integrated, forward looking and able to promote public transport as a viable option for access to employment and recreation.</p> <p>The council's commitment to growth through a new settlement is commendable and will help meet the objectives of the NPPF subject to an appropriate, sustainable location being selected. We submit that the proposed development Dunstall in the context of Brookhay has the potential to meet all facets of policy NS1 and is in a prime location to utilise planned infrastructure.</p>	Comments noted - proposal noted
LPRPO375	Naomi Light Leavsley Group	Chapter 9: Our spatial strategy	<p>Strategic Policy OSC1: Securing sustainable development, outlines that all future development within the district will be expected to 'contribute to the creation and maintenance of sustainable communities'. The provision of a new settlement affords the opportunity to design a place with sustainability as a core principle.</p> <p>A new settlement at Brookhay could be accessed sustainably upon completion of the committed Railway Station.</p> <p>Strategic Policy OSC4: High quality design, also notes that 'new development should be located in areas which have a good, safe access to public transport reducing the need to travel by car and optimising the choice of active sustainable travel options including walking and cycling'.</p> <p>It is known that the station is scheduled to open in 2032, significantly in advance of the timescales noted by the authority for projected initial completions within the new settlement around 2040. Suggest an initial phase of a new settlement at Brookhay should be brought forward in line with the planned Rail infrastructure subsequent to the Local Plan review in 2027. It is considered all three strands (social, economic and environmental) can be met through the provision of a new settlement in an appropriate location, and the growth orientated objectives of the emerging Local Plan achieved.</p>	Comments noted
LPRPO376	Naomi Light Leavsley Group	Chapter 12: Our sustainable transport	<p>The Leavesley Group are supportive of the objectives of Strategic Policy OST1: Our sustainable transport, which seek to ensure that new development is accessible on foot, via public transport and other means as an alternative to private vehicles, in addition to reducing the overall need to travel.</p> <p>Strategic Policy OST2: Sustainable travel, requires that 'development needing access by a large number of people to be located where it is or can be made accessible by non-car means of transport'. This objective is in accordance with the objectives of the NPPF and helps promote a modal shift away from car use. We would suggest that to fully realise the ambition of this policy, new developments should be located within proximity to rail infrastructure wherever possible.</p> <p>We would suggest the inclusion of additional wording that states proposals able to meet and promote the sustainability criteria outlined in OST1 should be prioritised for development over alternatives.</p>	Comments noted - Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO377	Naomi Light Leavsley Group	Chapter 13: Our homes for the future	<p>'Homes for the Future' details the quantum of housing required and how it will be delivered throughout Lichfield District over the plan period. The Leavesley Group wish to commend Lichfield on progressing a strong, pro-growth housing target, reflecting the positive attitude to development reflected throughout the emerging Local Plan. It is notable however that there is no mention of the proposed new settlement within any strategic housing policy. Recommend the Council cement its conviction to a new settlement within dedicated housing policy, rather than solely Policy NS1.</p> <p>Strategic Policy OHF4: Affordable housing, notes that there is a significant affordable need within Lichfield District (circa 80% of overall need). The authority is currently viability testing a policy increase from 35% to 40% affordable housing on applicable sites to look to address this unmet need. Should also consider other mechanisms available to meet affordable need. This includes adopting a higher housing requirement overall as an enabling mechanism for the delivery of affordable dwellings.</p>	Comments noted - Evidence within the HEDNA suggests the Council will be justified in seeking to achieve as much affordable housing as viably possible on appropriate development sites. Further viability evidence is being collected which will inform the policy and provide a clear position in terms of the appropriate level of affordable housing to be sought
LPRPO378	Naomi Light Leavsley Group	Chapter 14: Our economic growth, enterprise & tourism	<p>Strategic Policy OEET1: Our employment and economic development, identifies the Council's strategy for employment and economic development throughout the plan period.</p> <p>We would urge caution in adopting what the HEDNA describes as a 'midpoint' as there is significant evidence to suggest that the need is greater than 61ha. The HEDNA identifies that the figure may be as much as 144.6ha based on a past completions upper trend scenario, indeed even a lower trend scenario identifies a requirement of 78.9ha over the plan period.</p> <p>Based on these factors and Lichfield District's statement on a proactive approach towards growth, we would recommend a higher employment land target.</p> <p>Strategic Policy OEET2: Our centres, identifies the settlement hierarchy and how the settlements will develop within the emerging Local Plan. Rural Centres are noted as settlements with day to day services which meet the needs of the village and wider rural area. This desire to meet local needs is reflected in the Local Plan review objectives which outlines the importance of Rural Centres providing shops, services and employment. The Leavesley Group support the sentiments of OEET2 and suggest that sustainable settlements such as Fradley and their hinterland identified or housing growth, should accommodate additional sustainable development on unconstrained land to continue to meet local needs within and beyond the plan period</p>	Comments noted - HEDNA due to be updated. Existing allocated employment areas are identified on the policies maps which accompanied the Preferred Options document. Current evidence suggests there are limited additional options for locating employment growth, this is explicitly referred to within the consultation document.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO379	Naomi Light Leavsley Group	Chapter 16: Our natural resources	Supportive of the overall objectives within Strategic Policy ONR1: Green Belt, and commend the council's proactive approach to development through Green Belt release. However, we believe it should be noted within policy that exceptional circumstances must be realised, and all other options explored to accommodate development prior to concluding that it is necessary to remove land from the Green Belt, as per the guidance of paragraph 137 of the framework.	Comments noted - reference to greenbelt noted. Green Belt Review 2019 makes clear that 'exceptional circumstances' would need to be demonstrated if changes to the Green Belt boundary are proposed.
LPRPO380	Naomi Light Leavsley Group	Chapter 20: Larger service villages	The Vision for Fradley notes that the settlement will continue to grow with new homes and employment within and beyond the settlement boundary. Fradley is considered a well-connected, sustainable location with strong linkages to the strategic transport network. We would suggest that this consideration can also be applied to the surrounding area, particularly when consideration is given to the status of the committed Railway Station.	Comments noted - specifically relating to transport infrastructure
LPRPO381	Naomi Light Leavsley Group	Chapter NS1: New settlement	The Council have previously considered three broad locations for a new settlement within Lichfield District. These are Land around Shenstone, Brookhay (Fradley and Alrewas) and Land around Thorpe Constantine. Paragraph 72 of the NPPF outlines the criteria to be applied in the consideration of designing and locating a new settlement. The policy notes that new settlements should be 'well located and designed, and supported by the necessary infrastructure and facilities'. Paragraph 72(a) identifies that when locating a new settlement, existing and planned investment in infrastructure and the areas economic potential should be considered.	Comments noted.
LPRPO382	Liz Boden for Pegasus Group on behalf of Drayton Manor Park	Whole document	Fails to make clear Plan whether this a full plan or the first part of a two-part plan.	Comments noted. - will provide further clarification.
LPRPO383	Liz Boden for Pegasus Group on behalf of Drayton Manor Park	Chapter 7: Our vision	Relevant and broadly supported. However, the statement that "the Council has an aspiration to deliver housing and employment growth within our district" is considered not to be strong enough and should be amended to state there is a commitment to delivering housing and employment growth.	Comments noted - evidence will provide further justification to support vision.
LPRPO384	Liz Boden for Pegasus Group on behalf of Drayton Manor Park	Chapter 8: Strategic objectives & priorities	Generally supported and broadly relevant but consider cannot be fulfilled by current proposed spatial strategy, particularly with regards employment opportunities. Plan needs clearer referencing and links throughout. More detail regarding deliverability and viability. Policies map should be referred to as Proposals map until the plan is adopted.	Comments noted in relation to wording of maps.
LPRPO385	Liz Boden for Pegasus Group on behalf of Drayton Manor Park	Policy OSC1: Securing sustainable development	Generally supported where consistent with national policy. Suggest "no decline in standards being deemed acceptable as a result of new development." should be clarified to that new development should not cause air quality standards to be exceeded.	Comments regarding wording of policy noted.
LPRPO386	Liz Boden for Pegasus Group on behalf of Drayton Manor Park	Policy OSC4: High quality design	Generally supported. Policy should be updated to reflect latest national design policy.	Comments noted and will reflect national policy/guidance.
LPRPO387	Liz Boden for Pegasus Group on behalf of Drayton Manor Park	Chapter 10: Our sustainable communities	Generally supported. The approach to flood risk, sustainable drainage and water quality as set out in Policy OSC5 is broadly supported but the wording needs to be amended to reflect national policy and guidance.	Comments noted - further evidence through the SFRA and water cycle study will shape policy further.
LPRPO388	Liz Boden for Pegasus Group on behalf of Drayton Manor Park	Policy OEET1: Our employment and economic development	Welcome aspirations for economic growth and promotion of economic prosperity within the District are welcomed as part of a balanced sustainable strategy. More explanation required on floor space and land requirements for each use type to show how employment land needs will be delivered. Fails to acknowledge economic prosperity from business and tourism sector, such as Drayton manor Park. Policy may stifle existing and new business. Should identify Drayton Manor Park as a strategic employment site. Reference should be made to Council's strategic plan, and economic development strategy.	Comments noted - Existing allocated employment areas are identified on the policies maps which accompanied the Preferred Options document. Current evidence suggests there are limited additional options for locating employment growth, this is explicitly referred to within the consultation document.
LPRPO389	Liz Boden for Pegasus Group on behalf of Drayton Manor Park	Policy OEET3: Drayton Manor Park	Welcome inclusion of specific policy for DMP. Site should be identified as previously developed land in the Green Belt as Wyre Forest Plan and identified as an existing employment site. Happy to work with LDC to develop Masterplan or the whole site 15 year vision document submitted. It is contended that exceptional circumstances do exist to remove DMP from the Green Belt. Evidence submitted stating the site makes limited contribution to the purposes of Green Belt in landscape and visual terms and is a major contributor to the local economy. DMP supportive of site delivering objectives for biodiversity connectivity enhancements, query if this includes grassland in the nature recovery network mapping?	Comments noted, the Green Belt Review 2019 makes clear that 'exceptional circumstances' would need to be demonstrated if changes to the Green Belt boundary are proposed. This has been judged to be the case in the preferred options
LPRPO390	Liz Boden for Pegasus Group on behalf of Drayton Manor Park	Policy OEET4: Tourism	Support the growth of sustainable tourism, however regarding the requirements for 'where this does not conflict with other policies in the plan' As DMP is in the Green Belt and the construction of New buildings in the Green Belt is inappropriate it is up to the applicant to demonstrate the existence of very special circumstances for any buildings which do not constitute an exception to those listed in the NPPF. This may compromise the achievement of the aspirations of the Staffordshire and hotel visitor accommodation strategy.	Comments noted - as the site is within the Green Belt relevant GB policies must be taken into consideration.
LPRPO391	Liz Boden for Pegasus Group on behalf of Drayton Manor Park	Policy ONR1: Green Belt	Should be a strategic policy and a development management policy. As acknowledge that Green Belt requires changing at Fazeley to accommodate growth should re-examine and review to include land around DMP and south Fazeley to create a strong and enduring boundary. Should review through Local Plan not neighbourhood plan or allocations document as it is a strategic issue.	Comments noted the Green Belt Review 2019 makes clear that 'exceptional circumstances' would need to be demonstrated if changes to the Green Belt boundary are proposed. This has been judged to be the case in the preferred options .

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO392	Liz Boden for Pegasus Group on behalf of Drayton Manor Park	Policy ONR2: Habitats and Biodiversity	Generally supported where it is consistent with national planning policy. Policy should be reworded to reflect unpublished guidance.	Comments noted in reference to rewording
LPRPO393	Liz Boden for Pegasus Group on behalf of Drayton Manor Park	Policy ONR4: Green infrastructure and connectivity	Supportive of utilising opportunities to deliver objectives for biodiversity connectivity enhancements where feasible. Should be linked to future Green Infrastructure Study.	Commented note and acknowledged in reference to GIS
LPRPO394	Liz Boden for Pegasus Group on behalf of Drayton Manor Park	Policy ONR5: Natural and historic landscapes	Green Belt is not a landscape designation nor valued landscape. Policy should only reference AONB and its immediate surroundings. Policy on Green Belt should be in ONR1. Paragraph 11.6 states "There was an understanding and acceptance that infrastructure requirements would remain unclear until the level and location of development had been identified."	Comments noted and acknowledged with reference to the Green Belt
LPRPO395	John Adams on behalf of Lichfield Rail Promotion Group	Chapter 11: Our infrastructure	LRPG considers this is not the case with transport infrastructure. Considers that there is sufficient demand now to introduce rail services to and from Burton/ Derby and beyond and bring workers and visitors into the heart of the City. Similarly residents of Burntwood will benefit now from a rail service between Lichfield and Walsall with connections to Birmingham and Wolverhampton.	Comments noted provision of such infrastructure is beyond the parameters of LDC alone.
LPRPO396	John Adams on behalf of Lichfield Rail Promotion Group	Policy OST1: Our sustainable transport & Policy OST2: Sustainable travel	Welcomes the strategy to promote Lichfield as a Public Transport Interchange. It is essential therefore that clear proposals as to how this will be achieved are included in the Plan. LRPG's recommendations included in this submission identify the need to work more closely with Staffordshire County Council, Network Rail, Highways Agency, West Midlands Rail Executive, East Staffordshire and Walsall councils. Recommend that both the Council Plan and the Local Transport Plan should specify the agencies and neighbouring councils with whom they intend to collaborate so that this part of the Plan can demonstrate a clear direction and achievable purpose.	Comment noted provision of such infrastructure is beyond the parameters of LDC alone, as part of part the plan process LDC are engaging with relevant authorities/bodies in relation to such infrastructure
LPRPO397	Ben Cook (Pegasus) on behalf of Cooper Developments	Chapter 7: Our vision & Chapter 8: Strategic Objectives & Priorities	Considers the vision is relevant and broadly supported. However, the Vision contains a statement regarding a proposed new settlement which states that it will be "creating a community that will be a place where families will aspire to live". This is supported in principle; however, premise this should apply to the entire District rather than just the new settlement, reflecting the need for a balanced spatial strategy. The statement that the Council has an 'aspiration' to deliver housing and employment growth within the District is not strong enough and should be amended to state there is a 'commitment', rather than an 'aspiration', to delivering such growth. Paragraph 7.4 states the Council does not consider it necessary for the Vision to make specific reference to meeting the unmet need of the GBBCHMA. Considers that this should be included within the Vision to clearly demonstrate commitment to DTC with neighbouring authorities. Strategic Objective & Priority 6 should be strengthened to refer to also meeting a share of the unmet wider housing needs of the GBBCHMA LPR document would benefit from clearer referencing throughout in order to clearly demonstrate how the spatial strategy relates back to the Vision, Strategic Objectives & Priorities as well as its evidence base. Presently there is a lack of detail which is needed to demonstrate the viability and deliverability of the Strategy. Policies map should currently be referred to as a 'Proposals Map' until the Plan is adopted.	Comments noted regarding overall referencing to vision etc.
LPRPO398	Ben Cook (Pegasus) on behalf of Cooper Developments	Policy OSS2: Our spatial strategy	Pro-active approach taken towards GBBCHMA shortfall is welcomed however it is not clear how the figure of 4,500 dwellings has been identified. The GBBCHMA Strategic Growth Study identified locations for urban extensions and new settlements. None of these individually or combined result in the provision of 4,500 dwellings. Therefore it should be clarified in Policy OSS2 how the figure of 4,500 dwellings has been derived. South Staffordshire District Council and Cannock Chase District Council are both taking a similar approach and testing a contribution based upon the minimum levels of growth implied by the strategic areas of search identified within their areas in the Strategic Growth Study. South Staffordshire considers this provides certainty to other LPAs within the GBBCHMA that the Council is testing its recommended capacity to accommodate additional growth based on a consistent HMA-wide evidence base. If LDC we to take this consistent approach the following contribution towards meeting the GBBCHMA shortfall would need to be taken: 20,000 dwellings in respect of the new settlement recommended areas of search, 6,000 dwellings in respect of the sustainable urban extensions recommended areas of search and additional growth in terms of 'proportionate dispersal' as recommended by the Strategic Growth study. The LPR should consider the Areas of Search identified in the Strategic Growth Study and where options have not been pursued, clearly set out the evidence and reason for this. The overall settlement hierarchy is generally supported by Cooper Developments, with the clear focus of development remaining at Lichfield City.	Comments noted - Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review. The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO399	Ben Cook (Pegasus) on behalf of Cooper Developments	Policy NS1: New settlement	<p>Location of new settlement of around 10,000 dwellings within the District should be identified through the plan-making process and it is of paramount importance that this should not be a matter for a subsequent review of the local plan. Policy NS1 states that it is anticipated that the new settlement would start delivering homes at the end of the plan period of the LPR. It is not understood therefore how a new settlement would deliver homes within this plan period, if a location is not identified until a subsequent plan period when Policy NS1 acknowledges that a new settlement will take a number of decades to plan and complete.</p> <p>As such a new settlement cannot be relied upon as a potential source of housing or employment supply in this Plan, and in this case LDC should allocate additional sites to meet these needs.</p> <p>It is not understood why Policy NS1 is a 'preferred' policy rather than a 'strategic' policy, considered that such terminology is reflective of the inability to deliver the settlement within the plan period.</p>	Comments noted - further clarification to be provided
LPRPO400	Terence Wood	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>As a longstanding resident we have enjoyed the green fields opposite us, and will be disappointed if this is removed. What effect will this proposed development have on the wildlife? What about the extra pollution that will happen on the A453? Concerns regarding impact on already bad congestion at A453 junction.</p>	Comments noted - A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed. Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO401	Ben Cook (Pegasus) on behalf of Cooper Developments	Chapter 10: Our Sustainable Communities	<p>Approach to Policy OSC1 is generally supported where it is consistent with national policy, however certain aspects should be redefined. In particular, the policy wording in relation to air quality states that "no decline in standards being deemed acceptable as a result of new development." This wording is not clear, and it is suggested that it should be clarified that the intention of the policy is to ensure that new development should not cause air quality standards to be exceeded.</p> <p>Approach to Policy OSC4 is generally supported, however should be updated to reflect national design policy guidance.</p> <p>Approach to flood risk, sustainable drainage and water quality set out in Policy OSC5 is broadly supported, but wording needs to be amended to reflect national policy and guidance.</p>	Comments noted - with regards to policy OSC5 further evidence is being gathered in reference to flood risk through the water cycle study and level 2 SFRA.
LPRPO402	Ben Cook (Pegasus) on behalf of Cooper Developments	Policy INF1: Delivering our Infrastructure	<p>Policy INF1 is supported; however, it is considered there needs to be additional evidence published in support of the Local Plan Review regarding infrastructure in order to provide clarity over what additional infrastructure is required to support the allocations within the Local Plan Review and how these will be delivered. This is particularly relevant for the larger allocations which are likely to have significant infrastructure requirements associated with them.</p> <p>This evidence should include an update to the Infrastructure Delivery Plan (IDP) and further consultation with the County Council and other relevant consultees on matters such as highways modelling and education provision. Without such evidence the viability and deliverability of such allocations is questionable.</p>	Comments noted - LDC are coordinating with SCC alongside infrastructure providers in terms of shaping this policy further and the IDP.
LPRPO403	Ben Cook (Pegasus) on behalf of Cooper Developments	Chapter 12: Our Sustainable Transport	<p>Approach to sustainable transport set out in the policies within Section 12 are broadly supported. Notes that parking provision will continue to be determined with reference to the Sustainable Development Supplementary Planning Document (SPD). This is not in line with national policy which, states that maximum parking standards should only be set where there is clear and compelling justification that they are necessary for managing the local road network or for optimising density of developments in centres or areas well served by public transport. This justification has not been clearly provided. It is noted that the policy provides greater flexibility for the provision of parking to be considered for specific development proposals and this is supported.</p>	Comments noted - Will be reviewed against national policy

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO404	Ben Cook (Pegasus) on behalf of Cooper Developments	Policy OHF1: Housing provision	<p>It is not clear how the Strategic Development Allocations/ Areas relate to the spatial strategy or the settlement hierarchy. Additionally there is no reasoning that sets out the inconsistency with the current adopted spatial strategy. Unclear how spatial strategy has led to this and needs to be demonstrated and justified along with further details relating to those settlements that have been omitted.</p> <p>Unclear how strategic allocations have been defined, allocations within the plan range from 75-3,300 dwellings. This is of particular importance given the Council is proposing that non-strategic allocations will be made through Neighbourhood Plans and will form a fundamental part of the overall housing strategy. The threshold between 'strategic' and 'non-strategic' should be appropriately designed. LPR should also include alternative provisions should the progress of any Neighbourhood Plan stall</p> <p>Approach of leaving allocation of 'non-strategic' sites to Neighbourhood Plans is not supported, this approach is not consistent with national policy. LPR should as a minimum, identify broad locations for growth to be subsequently allocated through a Neighbourhood Plan or identify specific allocations for settlements which are not covered by a neighbourhood planning designation.</p> <p>Policy OHF1 should reflect paragraph 65 of the NPPF in that the housing requirement figures should reflect the overall strategy for the pattern and scale of development and any relevant allocations. Would be helpful to assign rural parishes included in the 'wider rural area' or given the whole district is parished, assign a minimum requirement figure for each parish.</p> <p>Supporting text states that the Council will 'make provision for' at least 11,800 dwellings between 2018-2040, wording should be strengthened to 'will deliver'. The total housing allocations identified provide 11,568 dwellings it should be clarified in supporting text if the balance (232 dwellings) is to be made up via windfall developments and how these assumptions have been arrived at.</p> <p>The current strategy is heavily reliant on a single large site to deliver the overall housing requirement (Land North East of Lichfield), this is not supported by detailed evidence to show work has progressed sufficiently to demonstrate deliverability of these during the plan period.</p>	<p>Comments noted - Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed. A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.</p>
LPRPO405	Ben Cook (Pegasus) on behalf of Cooper Developments	Chapter 13: Our homes for the future Policy OHF2: Providing a Balanced Housing Market and Optimising Housing Density	<p>Concerned that policy currently lacks flexibility to meet changing housing needs across the District and the plan period by referring to specific percentage figures. The most appropriate approach to housing mix is to be guided by market signals, as defined within the most up to date SHMA.</p> <p>Acknowledged the Council has produced a HEDNA however it is not clear from the HEDNA how the housing mix has been derived using detailed local evidence as per PPG. Evidence is currently high level, this should be clarified and explained further in the document.</p> <p>Policy lacks flexibility to reflect differences across sub-market areas; changing needs over plan period and site-specific considerations which will influence mix that can be delivered on individual sites. Plan proposes 4,500 additional homes to meet the needs of GBBCHMA. Housing needs of neighbouring authorities will be of consideration in determining housing mix on developments.</p> <p>Policy sets out minimum net density of 35 dwellings per hectare, considered to be broadly appropriate. Developments in Lichfield City, Burntwood and other locations with good public transport will be expected to achieve higher densities of approx. 50 dwellings per hectare which is broadly supported.</p>	<p>Comments noted. Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review.</p> <p>The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period.</p>
LPRPO406	Ben Cook (Pegasus) on behalf of Cooper Developments	Policy OHF4: Affordable housing	<p>Lack of specific affordable housing threshold in the policy does not accord with the NPPF or PPG. National policy requires a Local Plan to set an affordable housing percentage which should be subject to viability testing to confirm an appropriate figure.</p> <p>Policy seeks to allow flexibility in the tenure, size and type of affordable housing on a scheme by scheme basis. This flexibility is supported and should be delivered with reference to the most up to date SHMA.</p> <p>Approach to this section and policy OSCH1 is generally supported. However, the policy states that health and education infrastructure requirements related to strategic development proposals will need to be understood and determined through the Local Plan and accompanying evidence base so that it is clearly demonstrated that the strategic allocations are deliverable.</p>	<p>Comments noted. Evidence within the HEDNA suggests the Council will be justified in seeking to achieve as much affordable housing as viably possible on appropriate development sites. Further viability evidence is being collected which will inform the policy and provide a clear position in terms of the appropriate level of affordable housing to be sought.</p>
LPRPO407	Ben Cook (Pegasus) on behalf of Cooper Developments	Section 15: Our Healthy and Safe Communities & Policy OSHC1: Healthy and Safe Communities	<p>Infrastructure requirements for strategic sites will need to be considered by the viability process which national policy requires to be considered through the Local Plan. Further work is needed on the evidence base and in relation to viability testing regarding infrastructure.</p>	<p>Comments noted. Further evidence is being produced in relation to infrastructure and viability.</p>

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO408	Ben Cook (Pegasus) on behalf of Cooper Developments	Policy ONR1: Green Belt	<p>As currently drafted the policy covers both strategic and development matters related to Green Belt, it is suggested it would be clearer to separate these concerns into separate policies. Reference is made to national Green Belt policy then the policy wording itself does not reflect national policy, this should be rectified.</p> <p>There is an acceptance by the District Council that there needs to be changes to the Green Belt boundary to accommodate growth requirements to 2040. This recognition is welcomed and it is clear that the Council has started to produce the exceptional circumstances justification for such a release, but this needs to be supported by further evidence.</p> <p>Policy states that further 'non-strategic' changes to the Green Belt may be appropriate, but boundaries will be determined through Neighbourhood Plans or the allocations document. This approach is not appropriate, give the strategic importance of Green Belt delivering the overall proposed spatial strategy for the District.</p> <p>It is not clear why only three Areas of Development Restraint have been identified and it is questioned whether this will be sufficient to ensure Green Belt boundaries endure beyond 2040 as per the requirements of the NPPF.</p> <p>There is a clear role for the identified ADRs to provide a 'backstop' option for the housing requirements currently left for Neighbourhood Plans to allocate. Green Belt policy should be amended to include a mechanism to release ADRs early if Neighbourhood Plans fail to progress and allocate sites by a specified date.</p> <p>It is considered further land should be released from the Green Belt in order to ensure the Green Belt endures in the long term, such an appropriate site is Land off London Road, Lichfield.</p>	<p>Comments noted. The Green Belt Review provides a comprehensive strategic assessment of all parts of the green belt. The Green Belt Review 2019 makes clear that 'exceptional circumstances' would need to be demonstrated if changes to the Green Belt boundary are proposed. This has been judged to be the case in the preferred options document as stated at paragraph 16.5 in terms of meeting development needs and the identification of new Green Belt to the north of Lichfield City. The document identifies areas of 'Safeguarded Land' as defined within national policy. National policy states that consideration should be given that where changes to the Green Belt boundary are being proposed then areas of land between the urban area and the Green Belt (Safeguarded Land) should be identified to ensure the Green Belt boundary is capable of enduring beyond the plan period. The preferred options document identifies areas of such safeguarded land in conformity with national planning policy.</p>
LPRPO409	Ben Cook (Pegasus) on behalf of Cooper Developments	Chapter 16: Our natural resources Policy ONR5: Natural and Historic landscapes	<p>Approach to habitats and biodiversity set out within Policy ONR2 is generally supported where it is consistent with national policy. Draft policy continues to include biodiversity net gain requirement, supporting text clarifies this will be assessed through Natural England's biodiversity metric. The Government intends to publish standardised guidance on this so policy wording should be amended to include future documents.</p> <p>Policy ONR5 addresses natural and historic landscape, whilst the policy focuses on the AONB, it also references the West Midlands Green Belt. It is contended that Green Belt is not a landscape designation or a 'valued' landscape. Unclear why the policy makes reference to Green Belt. Any policy text regarding beneficial use of the Green Belt should be included in Green Belt Policy (ONR1).</p>	<p>Comments noted - in terms of the Green Belt.</p>
LPRPO410	Ben Cook (Pegasus) on behalf of Cooper Developments	Policy SHA1: Strategic housing north of Lichfield	<p>SHA1 proposes 3,300 new dwellings between two housing allocations; Land North East of Watery Lane and Land at Streethay. Development has started on the Streethay allocation it has not commenced on the Watery Lane site. Given that outline consent was granted in February 2017 and RM permissions for the spine road and green infrastructure was only granted in August 2019. the Council will need to be satisfied that here are no underlying issues preventing delivery of this new wider allocation. There needs to be clear evidence this site is deliverable within suitable timescales and at proposed numbers.</p> <p>Councils housing trajectory needs to clearly consider the impacts of allocating approx. 70% of the proposed dwellings allocated through this plan to a single site. Significant infrastructure requirements for allocations of this size and there is a risk that this allocation will not deliver homes until the end of the plan period leading to a major housing shortage at the beginning of the plan period which would need to be met by delivery of alternative sites that are smaller and are without the same infrastructure risks. Such an alternative site is Land off London Road, Lichfield.</p> <p>Proposed allocation North of Lichfield is poorly connected to the rest of the City and is reliant on only two principal connecting roads. Existing railway line separates the proposed allocation from the rest of the City, will pose a challenge to create a sustainable community which integrates with existing residents.</p> <p>Lack of evidence that local infrastructure can be viably upgraded to accommodate a development of the scale proposed. Significant work is needed to upgrade local and strategic highway network along with schools and healthcare infrastructure. Significant input from County Council, Highways England and other stakeholders to ensure relevant modelling is undertaken to test the allocation and identify is required infrastructure can be delivered. Absence of evidence highlights questions over the deliverability of the proposed allocation.</p> <p>Suggests that the housing requirement should be spread across various sites and settlements rather than concentrating on a single large allocation. This approach would provide greater flexibility and deliverability. An appropriate alternative site is Land off London Road, Lichfield.</p>	<p>Comments noted - A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed. Policy SHA1 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.</p>

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LPRPO411	Ben Cook (Pegasus) on behalf of Cooper Developments	Whole Document & Sustainability Appraisal	<p>SA document needs to provide further narrative to explain how the spatial strategy and associated allocations were selected over reasonable alternatives. It set out at Section 2.4 that the spatial strategy reflects a combination of Residential Growth Options 2 and 4 and Employment Growth Option 1, but no clear narrative explaining how selections were made. There is also no explanation of how 4,500 dwellings contribution towards the GBBCHMA shortfall has been determined.</p> <p>Paragraph 2.6.3 confirms no employment sites are identified at the Preferred Options stage, it is unclear why this is and effectively results in the implementation of the 'do nothing' approach to employment. This should be justified in the SA.</p> <p>It is noted that sites that are not deemed to be strategic in nature are excluded from the assessment. However, the cumulative impact of non-strategic sites can contribute towards a sustainable, balanced strategy and therefore does form a reasonable alternative which should be included and considered by the SA.</p> <p>When assessing the long-term effects in Section 2.8, the assumption was made that mitigation measures have been proposed that these have been applied. Helpful if this section clarified what the mitigation measures are and who has proposed them.</p> <p>The key national plans, policies and programmes fails to make reference to the government policies regarding delivery of homes, with the NPPF reiterating the Government's objective of significantly boosting the supply of homes (Paragraph 59). This is key consideration in the drafting of the Plan and the accompanying SA and should be included.</p> <p>Strategic allocation of 5,535 dwellings is supported overall, but this needs to be as part of a balanced strategy. Proposed allocations are focused on Lichfield and other larger service village; Fradley, Fazeley and Whittington, this does not represent a balanced strategy or align with Policy OSS2.</p>	<p>Comments noted. Existing allocated employment areas are identified on the policies maps which accompanied the Preferred Options document. Current evidence suggests there are limited additional options for locating employment growth, this is explicitly referred to within the consultation document.</p> <p>A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.</p>
LPRPO412	Ben Cook (Pegasus) on behalf of Cooper Developments	Whole document	<p>Promoting a 5.07ha site (SHLAA ref:277) to the south of Lichfield City located in-between Cricket Lane and South of Lichfield SDAs. Located within reasonable proximity to public transport and strategic local road network. Anticipated the site can accommodate approx. 156 dwellings (35 dwellings per hectare), 0.6ha of public open space inclusive of a LEAP. The site would be accessed via London Road.</p> <p>Disagrees with a number of findings within the Site Selection Methodology for the site. Site should score green in terms of Spatial strategy as it is located immediately adjacent to the settlement boundary for Lichfield City. Site is located adjacent to Grade II listed building, assessment states Amber sites will result in no harm to adjacent heritage assets, therefore it is not understood how this results in amber for Heritage assets. Biodiversity has been scored amber despite no-one from LDC or consultants have undertaken an ecological survey of the site. Submitted preliminary ecological appraisal shows that the sites performs a limited role in respect of biodiversity and should score a green rating. The site scored significantly better against the purposes of the Green Belt when compared to the wider parcel of land it forms part of within the Council's Green Belt Assessment. Scores amber in terms of landscape character however likely impacts on landscape character and visual impacts would be limited and localised. They are also capable of being mitigated and should therefore score green. The site does not fall within any land associated with HS2 and should therefore score Green. Also, submitted alongside the representation is a Preliminary Ecological Appraisal, Landscape and Visual Statement and a Highways and Transport note.</p>	<p>Comments noted Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.</p>
LPRPO413	Mervyn Taylor	Policy ONR1: Green Belt	<p>Green Belt should be protected, especially in Hammerwich. Fields are used for drainage. Road infrastructure poor in locality.</p>	<p>Comments noted - The Preferred Options document does not propose any new homes within the Green Belt at Burntwood/Hammerwich area. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.</p>
LPRPO414	Christine Illsley	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>The traffic situation is poor currently, will only be further exacerbated. Also the infrastructure is not there to cope with the overload a further 800 houses would bring. To lose that amount of Green Belt in the present global warming situation would be a big mistake.</p>	<p>Comments noted. Policy SHA2 includes requirement for appropriate infrastructure as part of the development of the site. The loss of Green Belt and countryside is justified through the evidence</p>
LPRPO415	K Button	Whole document	<p>Green Belt in Burntwood should not be developed on, there are appropriate brownfield sites. There is a lack of infrastructure in Burntwood which needs addressing. Supports new settlement policy</p>	<p>Comments noted. - The Preferred Options document does not propose any new homes within the Green Belt at Burntwood/Hammerwich area. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.</p>
LPRPO416	Peter Button	Whole document	<p>Green Belt in Burntwood should not be developed on, there are appropriate brownfield sites. There is a lack of infrastructure in Burntwood which needs addressing. Supports new settlement policy</p>	<p>Comments noted. - The Preferred Options document does not propose any new homes within the Green Belt at Burntwood/Hammerwich area. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.</p>

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LPRPO417	Philippa Kreuser (CT Planning) on behalf of W Lockhart	Whole document	<p>Basis of the representation is as follows: 1) Support for the strategic allocation of 800 dwellings at Fazeley in Policy OHF1. 2) Object to the allocation of land west of Sutton Road. 3) Object to the inclusion of land promoted by representation within the Green Belt. It is proposed that the Preferred Options should be amended by removing the proposed allocation from Fazeley and allocating the site promoted by representation.</p> <p>Fazeley is identified as a level 3 - larger service village within the settlement hierarchy as such the allocation of homes at Fazeley is supported. Objection is on the basis that the wrong site for this allocation has been chosen. It is not considered to be well related to the existing settlement pattern. Furthermore the proposed allocation does not follow the principles for defining Green Belt boundaries provided at paragraph 139 of the NPPF. Green Belt boundaries should be consistent with the local plan strategy for meeting identified development requirements, boundaries should be set to meet longer term development needs stretching well beyond the plan period and those boundaries should not need to be altered at the end of the plan period. Proposed Green Belt boundaries should use 'readily recognisable' features. Concern with the site west of Sutton Road is the boundaries are not readily recognisable.</p> <p>Land promoted by representation is a suitable location to accommodate up to 800 dwellings. Consider deletion of site from Green Belt would establish a Green belt boundary to the south of Fazeley that will endure and make provision for the future development of Fazeley in this plan period and beyond.</p>	Comments noted. The District Council has identified strategic sites within the Preferred Options document based upon a range of evidence. The site selection paper provides detail of the approach taken.
LPRPO418	Mr Heath	Policy ONR1: Green Belt	<p>Against loss of Green Belt in Burntwood, Infrastructure unable to cope with any further development and will detriment to the environment.</p>	Comments noted. - The Preferred Options document does not propose any new homes within the Green Belt at Burntwood/Hammerwich area. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
			<p>1. Consultation Procedure - not formally notified of the LDLPR:PR Consultation only found out due to a newspaper article published in Tamworth Herald on Thursday 5th December. This newspaper article highlighted a drop in session, not an official Lichfield District Council (LDC) notification. drop in session not advertised on LDC's website. tweet promoting the drop in session only appeared day of the event. Do not consider that adequate nor was appropriate notice given in advance of the drop in session to enable local residents to attend event. Officers did not appear to want to enter into discussions about the Development Allocation nor attempt to answer questions. 2. Site Selection Process- The Site Selection Paper (SSP) assessed 360 sites, and of those, 194 sites were considered deliverable. However, we do not consider it is fully justified as to how LDC have arrived at the conclusion that of those 194 sites only 4 sites have been chosen as the most appropriate to deliver housing growth. Numerous brownfield sites have been discounted for reasons such as land ownership, highway implications, flood risk, deliverability etc. However, in contrast, it is not clear that consideration has been given to the highway implications, flood risk, drainage, and infrastructure requirements etc. of the Development Allocation. Why have some implications such as impact on highways, for example, been considered for some of the sites resulting in them being discounted, but not considered for all sites? We consider that highways, infrastructure and flood risk are some of the key issues relating to the suitability of the Development Allocation. Surely Statutory Consultees should have been consulted on the SSP prior to concluding which development allocations will proceed for the LDLPR:PR? We have been unable to find any Statutory Consultee responses on the LDC website. Why are the Statutory Consultation responses in relation to these issues not available for review by local residents? 3. Use of Green Belt Land for Housing - The LDC Site Allocations Document (SAD) was adopted in July 2019. This document is referred to at paragraph 2.6 of the LDLPR:PR as identifying "...site specific proposals and policies to deliver the strategic vision established through the local plan strategy." This document bears no resemblance to the current consultation and the Development Allocation. Housing Land Allocations for Fazeley, Mile Oak and Bonehill in the SAD were identified within the settlement boundary not within Green Belt. Why is that within 4 months of such a document being adopted that it is now being reviewed with such substantial changes? What 'exceptional' circumstances have occurred to determine that the Green Belt boundaries at this location should be altered? Where is the full consideration of all reasonable alternatives within the LDLPR:PR and its evidence base? Why have the parcels around Fazeley, Mile Oak and Bonehill identified as 'minor' not been put forward for development? Why has this evidence not been obtained prior to the LDLPR:PR Consultation and its proposed use of Green Belt for development? It is our view that the Development Allocation does not conform to the requirements of the NPPF paragraph 136.</p> <p>4. Development Allocation Site Specific Issues:- 4.1 Highways 4.2 Transport 4.3 Infrastructure 4.4 Community Facilities 4.5 Environment</p>	

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LPRPO419	Ben and Victoria Burnett Rogers	Whole document	<p>5. Impact on Landscape Character- The Landscape Character Assessment (LCA) dated September 2019 identifies the Development Allocation as falling within the 'Wooded Estate lands of the Tame Valley'. The strength of its landscape character is described at paragraph 4.15.4 as "Although the natural dimension of the Wooded Estate lands is rather weak and largely confined to watercourses, the historic character of this well ordered, rural, agricultural landscape is strong and characterised by country estates, discrete rural villages and extensive tree cover. " vision for this landscape is stated at 4.15.6 "Conserve and restore the structure and overall integrity of this historic, rural landscape. consider Development Allocation disregards vision of the LCA.6. Increased Flood Risk- As mentioned above, the Development Allocation Prefers in the notes to 'potential risk of ground water flooding'. The Level One SFRA confirms the site is subject to flooding. As we are local residents we can state from experience that ground water, storm water and over ground flooding does occur during heavy rain.It needs to be highlighted that the Bourne Brook Cut (a man-made structure) with no natural flow adjoins the Development Allocation at its lowest point. Does this structure have the capacity for additional over land, storm and ground water flows from the Development Allocation? Why has issue of flood risk been ignored and Development Allocation continued to be pursued? 7. Sustainability of Development Allocation - Policy OHF1: Housing Provision of the LDLPR:PR requires residential development to "Contribute to the achievement of sustainable communities" consider there is no clear evidence that required infrastructure (highway, transport, utilities etc.) is available or has capacity to support such a proposal. Paragraph 20.21 of the LDLPR:PR states "...Fazeley, Mile Oak and Bonehill is struggling to provide a quality environment for its residents and lacks important services and facilities, those related to health and well being.. consider that a greater level of growth, unconstrained by heritage requirements is fundamental if we are to facilitate a step change in terms of access to homes, facilities and services for this community." unclear how provision of extra homes will address this, given traffic issues; access to doctors; access to sustainable forms of transport; risk of flooding etc. already experienced in this location.Paragraph 20.27 of the LDLPR:PR states "The Robert Peel Community Hospital is located within the settlement providing a range of primary and emergency care." This is extremely misleading. The hospital is not within settlement, it is within Green Belt. The hospital is not an A&E and only provides limited services. There has also been recent loss of mental health care provision. LDC should be fully aware of status and location of the hospital. What other errors and misleading information is included within the LDLPR:PR?8. Other Evidence Base Documents - unclear as to why Urban Capacity Study (dated October 2019) has been undertaken after Site Selection Paper (dated September 2019). Surely a study of the capacity of urban/brownfield land within the District should inform site selection? Has document been retrofitted to support release of Green Belt rather than use vacant brownfield land within the District?The Housing Strategy for LDC is dated as 2013-2017 and was approved in April 2013. Your website stated in December 2019 that "We are</p>	<p>Comments noted. The consultation event was publicised in the local press, on the council's website, via social media and via email to those subscribed to local plan database. The removal of the site from the green belt has been assessed within the Green Belt review evidence base. Policy SHA2 includes requirement for appropriate infrastructure as part of the development of the site.</p>
			<p>1. Consultation Procedure - We were not formally notified of the LDLPR:PR Consultation and only found out about the Development Allocation due to a newspaper article published in the Tamworth Herald (the local newspaper for our area) on Thursday 5th December. This newspaper article highlighted a drop in session due to take place at Fazeley Town Hall on the Monday 9th December 2019, between 3pm and 6pm. This was not an official Lichfield District Council (LDC) notification. This drop in session, along with a number of other sessions, was not advertised on LDC's website. A tweet promoting the drop in session only appeared on the day of the event. Therefore we do not consider that adequate nor was appropriate notice given in advance of the drop in session to enable local residents, many of whom work, to make arrangements to attend the event. Officers did not appear to want to enter into discussions about the Development Allocation nor attempt to answer questions.</p> <p>2. Site Selection Process-</p> <p>The Site Selection Paper (SSP) assessed 360 sites, and of those, 194 sites were considered deliverable. However, we do not consider it is fully justified as to how LDC have arrived at the conclusion that of those 194 sites only 4 sites have been chosen as the most appropriate to deliver housing growth.</p> <p>Numerous brownfield sites have been discounted for reasons such as land ownership, highway implications, flood risk, deliverability etc. However, in contrast, it is not clear that consideration has been given to the highway implications, flood risk, drainage, and infrastructure requirements etc. of the Development Allocation.</p> <p>Why have some implications such as impact on highways, for example, been considered for some of the sites resulting in them being discounted, but not considered for all sites?</p> <p>We consider that highways, infrastructure and flood risk are some of the key issues relating to the suitability of the Development Allocation.</p> <p>Surely Statutory Consultees should have been consulted on the SSP prior to concluding which development allocations will proceed for the LDLPR:PR?</p> <p>We have been unable to find any Statutory Consultee responses on the LDC website.</p>	

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			<p>3. Use of Green Belt Land for Housing - The LDC Site Allocations Document (SAD) was adopted in July 2019. This document is referred to at paragraph 2.6 of the LDLPR:PR as identifying "...site specific proposals and policies to deliver the strategic vision established through the local plan strategy." This document bears no resemblance to the current consultation and the Development Allocation. Housing Land Allocations for Fazeley, Mile Oak and Bonehill in the SAD were identified within the settlement boundary not within Green Belt.</p> <p>Why is that within 4 months of such a document being adopted that it is now been reviewed with such substantial changes?</p> <p>What 'exceptional' circumstances have occurred to determine that the Green Belt boundaries at this location should be altered?</p> <p>Where is the full consideration of all reasonable alternatives within the LDLPR:PR and its evidence base?</p> <p>Why have the parcels around Fazeley, Mile Oak and Bonehill identified as 'minor' not been put forward for development?</p> <p>Why has this evidence not been obtained prior to the LDLPR:PR Consultation and its proposed use of Green Belt for development?</p> <p>It is our view that the Development Allocation does not conform to the requirements of the NPPF paragraph 136.</p> <p>4. Development Allocation Site Specific Issues:- 4.1 Highways 4.2 Transport 4.3 Infrastructure 4.4 Community Facilities</p> <p>5. Impact on Landscape Character- The Landscape Character Assessment (LCA) dated September 2019 identifies the Development Allocation as falling within the 'Wooded estate lands of the Tame Valley'. The strength of its landscape character is described at paragraph 4.15.4 as "Although the natural dimension of the Wooded estate lands is rather weak and largely confined to watercourses, the historic character of this well ordered, rural, agricultural landscape is strong and characterised by country estates, discrete rural villages and extensive tree cover. "The vision for this landscape is stated at 4.15.6 "Conserve and restore the structure and overall integrity of this historic, rural landscape. We consider the Development Allocation disregards the vision of the LCA.</p> <p>6. Increased Flood Risk- As mentioned above, the Development Allocation prefers in the notes to 'potential risk of ground water flooding'. The Level One Strategic Flood Risk Assessment (SFRA) confirms the site is subject to flooding.</p> <p>As we are local residents we can state from experience that ground water, storm water and over ground flooding does occur during heavy rain.</p> <p>It needs to be highlighted that the Bourne Brook Cut (a man-made structure) with no natural flow adjoins the Development Allocation at its lowest point.</p> <p>Does this structure have the capacity for additional over land, storm and ground water flows from the Development Allocation?</p> <p>Why has the issue of flood risk been ignored and the Development Allocation continued to be pursued?</p> <p>7. Sustainability of Development Allocation - Policy OHF1: Housing Provision of the LDLPR:PR requires residential development to "Contribute to the achievement of sustainable communities"</p> <p>We consider there is no clear evidence that the required infrastructure (highway, transport, utilities, facilities etc.) is available or has the capacity to support such a proposal.</p> <p>Paragraph 20.21 of the LDLPR:PR states "...Fazeley, Mile Oak and Bonehill is struggling to provide a quality environment for its residents and lacks important services and facilities, those related to health and well being...However, we</p>	

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO420	Mr & Mrs Burnett	Whole Document	<p>We are unclear how the provision of extra homes will address this, particularly given the traffic issues; access to doctors; access to sustainable forms of transport; risk of flooding etc. already experienced in this location.</p> <p>Paragraph 20.27 of the LDLPR:PR states "The Robert Peel Community Hospital is located within the settlement providing a range of primary and emergency care." This is extremely misleading. The hospital is not within the settlement, it is within Green Belt. The hospital is not an Accident and Emergency hospital and only provides limited services. There has also been the recent loss of mental health care provision.</p> <p>LDC should be fully aware of the status and location of the hospital. What other errors and misleading information is included within the LDLPR:PR?</p> <p>8. Other Evidence Base Documents - We are unclear as to why an Urban Capacity Study (dated October 2019) has been undertaken after a Site Selection Paper (dated September 2019).</p> <p>Surely a study of the capacity of urban/brownfield land within the District should inform site selection?</p> <p>Has this document been retrofitted to support the release of Green Belt rather than use vacant brownfield land within the District?</p> <p>The Housing Strategy for LDC is dated as 2013-2017 and was approved in April 2013. Your website stated in December 2019 that "We are currently working on a revised strategy that will replace this version in the coming months."</p> <p>Again, surely the housing needs of the District and LDC's strategy of how to deliver housing to meet the needs should inform site selection?</p>	<p>Comments noted. The consultation event was publicised in the local press, on the council's website, via social media and via email to those subscribed to local plan database. The approach taken for the consultation was reported to members prior to the beginning of the consultation. The consultation was conducted in accordance with the Council's adopted Statement of Community Involvement (SCI) which sets out how the Council will undertake consultations. The removal of the site from the green belt has been assessed within the Green Belt review evidence base. Policy SHA2 includes requirement for appropriate infrastructure as part of the development of the site. A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed. Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.</p>
LPRPO421	Mr & Mrs Shaw	Policy ONR1: Green Belt	<p>Strongly object to the proposal in Strategic Policy ONR1: Green Belt to remove the land off Coulter Lane from the Green Belt. We very strongly object to more development on Coulter Lane. Burntwood facilities have been left behind. We like to walk around Coulter Lane and Nether Lane as it is the only place we can get fresh air and admire the countryside and observe wildlife. Our environment and wildlife must be better protected, that is why we strongly object to more development on Coulter Lane. In our opinion Burntwood with the infrastructure and facilities that we have is full. Please leave our Green Belt Green</p>	<p>Comments noted. The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.</p>
LPRPO422	Paul Worrall	Policy ONR1: Green Belt	<p>Strongly object to the proposal in Strategic Policy ONR1: Green Belt to remove the land off Coulter Lane from the Green Belt. Have lived in Burntwood for many years and have watched more and more houses being built without supporting facilities. Difficult to get a doctors appointment. Very strongly object to more development on Coulter Lane, this is a beautiful area and nice to walk down the lines to get fresh air and see different birds. Burntwood facilities have been left behind and forgotten in many ways. No police station and overflowing schools. Shops at Sankey's corner are stuck in the 1970's if not empty. Local roads are log jammed and in need of repair. Council needs to look after the residents it has, rather than helping companies and beneficiaries reap profit.</p>	<p>Comments noted. The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents. The local plan includes policies to seek appropriate infrastructure delivery.</p>
LPRPO423	Stephen Stoney (Wardell Armstrong) on behalf of J.T Leavesley Ltd	SHA3: Strategic housing allocation land north and south of Hay End Lane, Fradley	<p>The Leavesley Group wishes to unequivocally support the proposed allocation – as part of the strategic allocation SHA3 of the controlled site as developable, deliverable and viable.</p> <p>There is a commitment to co-ordinated working in bringing forward complimentary development to fulfil the main objectives of the Plan policies SHA3, FR1, FR2 and FR3. This will be extended to a full planned consultation process in taking forward developing proposals with the Parish Council, which will assist in informing the intended Neighbourhood Plan Review</p> <p>The principle of further relevant housing led growth within the Fradley area accelerating the delivery of essential community and infrastructure assets is supported as realisable. In this respect, the proposed allocation is a firm means of realising a reasonable proportion of the community aspirations set out in the adopted Fradley Neighbourhood Plan. The SHA3 Design section refers to 'how the development addresses climate change and can deliver a net zero development by 2050'. In this context it should be recognised that a net zero carbon target is hugely ambitious and will depend upon uncontrollable external factors beyond the end of this Plan period. Any proposed development will require energy and create emissions in one form or another, and the only way of achievement is generating more energy than usage. Therefore, the policy when developed further in context will require a more precise definition in order that development is not implementable. If it can be assured that grid power will be fully renewable by 2050 then the future will be net zero carbon. Thereafter however, the more decarbonised the harder it becomes to offset any emissions. This is because it requires local generation to counteract carbon generation. It is assumed that the Plan will formalise the viability of the above through the requirement set out in Section 14 of the NPPF and the NPPG 002.</p>	<p>Comments noted- matters relating to energy efficiency and zero carbon policy wording will be reviewed and assessed.</p>
LPRPO424	Stephen Stoney (Wardell Armstrong) on behalf of J.T Leavesley Ltd	Policy FR3: Fradley economy	<p>The core vision of growth is clearly through the delivery of both employment and housing in a justified manner. Preferred Options Policy SHA3 identifies the housing growth to be allocated to Fradley. Policy FR3: Fradley economy identifies that Fradley business park will remain a major focus for continued employment and expansion. The NPPF clearly advocates a close correlation between the provision of employment and the provision of housing to maximise sustainability.</p>	<p>Comments noted, to be reviewed.</p>

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LPRPO425	Stephen Stoney (Wardell Armstrong) on behalf of J.T Leavesley Ltd	Policy FR1: Fradley environment	In the context of Local Policy FR1: Fradley environment, the Canal side site has an existing biodiversity value of 19.7 units and a net gain from the proposed development of Canal side is proposed of 26.55 units generated through both on site and off-site habitat creation. The level of uplift is achieved through the planning of 3.7ha of mixed woodland on currently vacant arable land. The level of uplift and the habitats that have been promoted have been confirmed as acceptable. The principles of Biodiversity offsetting and impact mitigation on the Cannock Chase SAC have therefore been proven as achievable. It is recognised that the canal is a non-designated heritage asset directly adjacent to the Canal side site, and the principle of sympathy through form and function in scheme design is appreciated.	Comments noted - matters relating to ecology and biodiversity have been determined through the relevant evidence base.
LPRPO426	Stephen Stoney (Wardell Armstrong) on behalf of J.T Leavesley Ltd	Policy FR2: Fradley Services and Facilities	Local Policy FR2: Fradley services and facilities highlights the need for offering an equal or improved service to the community through local amenities and services. This element of the proposed development of Canal side – a neighbourhood centre containing a community hub – has been the subject of liaison with Fradley Parish Council in terms of alignment with the Neighbourhood Plan and the aspirations for improved community infrastructure. It is totally recognised that a primary health care provision is an aspiration, and the Canal side development will look to support this in a pro-active and practical manner through a medical centre. New routes will be created for sustainable travel to enable safe and convenient connection between planned services and facilities and the existing Fradley settlement, promoting one cohesive community.	Comments noted, once comments from relevant infrastructure providers have been received, relevant policies will be updated in due course
LPRPO427	Philippa Kreuser (CT Planning) on behalf of South Staffordshire Water PLC	Policy OHF1: Housing provision & Policy OSS2: Our Spatial Strategy	Supports Policy OHF1 to provide for some 100 new dwellings at Shenstone which would be delivered through either the review of the Shenstone Neighbourhood Plan or through an Allocations Document. Supports the inclusion of Shenstone as a Level 3 - Larger Service Village in the settlement hierarchy as set out in Policy OSS2. Given the sustainable credentials of Shenstone it is considered that the settlement could support a greater number of dwellings than the 100 proposed. There is sufficient land adjoining Shenstone including small sites for development, one such site is land adjacent to Shenstone Pumping Station, Lynn Lane, the site is 1.5ha and could accommodate 53 dwellings at a density of 35dph. A residential allocation at this site would represent a logical rounding off to the settlement without adversely impacting upon the function of the Green Belt and can offer sufficient land for landscape treatment. The site is within 500m of the majority of services and facilities offered in the village including the train station.	Comments noted - Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed. A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO428	David Coleby (Mark Liell LLP) on behalf of Mr & Mrs J Kingslake	Chapter 8: Our strategic objectives & priorities	We support this objective of growing certain larger service village settlements to increase the populations, thereby helping to underpin and assist the viability of existing services and facilities and provide scope to supplement the community offer and make the locations more self-sufficient and sustainable. Particularly within the allocation site within Mile Oak/Fazeley.	Comments noted.
LPRPO429	David Coleby (Mark Liell LLP) on behalf of Mr & Mrs J Kingslake	Policy OHF1: Housing provision	Support proposed allocation detailed within SHA2 in the strategic provision of housing within the district in this plan period.	Comments noted.
LPRPO430	David Coleby (Mark Liell LLP) on behalf of Mr & Mrs J Kingslake	Policy OSS2: Our spatial strategy	We support the delivery of a minimum of 7,282 dwellings based on district area need, a contribution of 4,500 towards meeting the Greater Birmingham and Black Country housing market area needs, and a 'minimum' of 11,800 overall in the plan period to 2040. We consider that there is logic in locational, connectivity and accessibility terms to concentrate the housing growth in the southern half of the District in close proximity to the road network where capacity exists to accommodate the increased generation/movements, and best relates to the wider Birmingham housing market area. Support the Council's focus on Fazeley, Mile Oak and Bonehill as a preferred location for the allocation of new dwellings to improve sustainability and underpin existing services and facilities (health, schools, and shopping) and through increased population and therefore demand, make both existing and new additional services more viable.	Comments noted - Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review. The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period.
LPRPO431	Philippa Kreuser (CT Planning) on behalf of Mr R Orme David Coleby (Mark Liell LLP)	Policy OSS2: Our spatial strategy & Policy OHF1: housing provision	Supports Policy OSS2 and the inclusion of Little Aston as a Level 3: Larger Service Village. Policy OHF1 does not specifically grant a housing allocation to Little Aston, it is submitted that Little Aston should be allocated a specific housing provision as a Level 3 Service Village and location in a sustainable location. Table 3.11 should be amended to provide for a specific housing allocation in Little Aston. Policy LA1 seeks to support the 'vitality and viability' of services and villages within Little Aston, in order to do this effectively it is essential the Council promotes new housing development in the village. Land is available adjacent to Cottage Farm, Blake Street to come forward as a housing allocation through either the Neighbourhood Plan or an Allocations Plan. Site is highly sustainable located 500m west of Blake Street railway Station, services and facilities can be accessed within easy walking distance of the site. The site could provide 65 dwellings.	Comments noted - Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review. The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period.
LPRPO432	David Coleby (Mark Liell LLP) on behalf of Mr & Mrs J Kingslake	Policy SHA2: Strategic housing allocation land west of Fazeley	Support overall objective, potential for further diversification and growth within site beyond allocation proposal	Comments noted.

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LPRPO433	Philippa Kreuser (CT Planning) on behalf of Eden Wood	Policy ONR1: Green Belt	Support ONR1 ADR on Fossey Lane The ADR land is well related in size and scale to the existing allocations at Deanslade Farm and Limburg Avenue. The release of the land from the Green Belt in this location would not undermine the purposes of the Green Belt; it represents a logical extension to the built up area of Lichfield. In the longer term, it can contribute to the delivery of new homes in a sustainable location. Its release from the Green Belt and allocation as ADR land in the emerging Local Plan is supported.	Comments noted - The document identifies areas of 'Safeguarded Land' as defined within national policy. National policy states that consideration should be given that where changes to the Green Belt boundary are being proposed then areas of land between the urban area and the Green Belt (Safeguarded Land) should be identified to ensure the Green Belt boundary is capable of enduring beyond the plan period. The preferred options document identifies areas of such safeguarded land in conformity with national planning policy.
LPRPO434	Jan Rogers	Whole document	Concerns centre around Green Belt land off Coulter Lane/ Church Road, Burntwood. Country lanes couldn't accommodate more traffic even with modification, there is already severe congestion around the local primary schools. The area is home to extensive wildlife and is of great value to residents in terms of health benefits, bird watching and encouraging self-sufficiency through allotments. There are plenty of brown sites which will only deteriorate whilst developers decimate the countryside ruining rural communities. Brown sites are seen as too difficult whilst in reality a little thought and extra effort they could be enhanced. Land at Morley Road should be considered for housing whilst relocating existing businesses. Retail units planned for the blue hoarding site are no longer needed, therefore land should be freed up for housing. Consideration of a new settlement could be an alternative and more suitable solution.	Comments noted - The document identifies areas of 'Safeguarded Land' as defined within national policy. National policy states that consideration should be given that where changes to the Green Belt boundary are being proposed then areas of land between the urban area and the Green Belt (Safeguarded Land) should be identified to ensure the Green Belt boundary is capable of enduring beyond the plan period. The preferred options document identifies areas of such safeguarded land in conformity with national planning policy. The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO435	Fisher German on behalf of Mr Nigel Storr	Whole document, Policy OSS1: Presumption in favour of sustainable development, Policy OSS2: Our spatial strategy, Policy OHF1: Housing provision, Policy OHF2: Housing mix, Policy ONR1, Policy ONR2: Green Belt	Representation relates to clients land which is part of the proposed allocation SHA1. Note the vision for the vision for the district is one of growth. Acknowledge that the council will deliver a minimum of 7,282 dwellings plus a contribution of 4,500 dwellings towards meeting the Greater Birmingham and Black Country housing market area shortfall. The review identified land to the north-east of Lichfield as a strategic development allocation to accommodate approx. 3,300 new homes. Policy PHF2 provides for a balanced housing market and optimising housing density with a mix of housing. This is accepted in principle but must allow for large developments to be viable. Such large developments require significant investment and offsite infrastructure provision. We request that LDC moderate its policy to allow flexibility having regard to the cost of bringing forward land for development in term of financial contribution and mix onsite of affordable and market housing provision. Policy ONR1 makes reference to the Green Belt and indicates the provision of new Green belt to the north of Lichfield alongside the strategic allocation defined by the line of HS2. If built HS2 will form a permeant break between Lichfield and Fradley and will in itself define the northern extent of Lichfield City, we see no need for new green belt to prevent coalescence in the circumstances that HS2 is delivered. Agree with the vision of Lichfield and Streethay. Agree with the design principles and the infrastructure requirements and well work with the Council and other stakeholders in the production of a masterplan for the site. If HS2 is cancelled then suggested the northern boundary of the allocation should be reconfigured to incorporate further land in clients control.	Comments noted. Green Belt Review 2019 makes clear that 'exceptional circumstances' would need to be demonstrated if changes to the Green Belt boundary are proposed. This has been judged to be the case in the preferred options document as stated at paragraph 16.5 in terms of meeting development needs and the identification of new Green Belt to the north of Lichfield City.
LPRPO436	Philippa Kreuser (CT Planning) on behalf of Mr and Mrs Johnson	Policy OSS2: Our spatial strategy	Supports Policy OSS2 and the identification of Fradley as a Level 3 Larger Service Village in the settlement hierarchy. It is not clear from the document how smaller sites, which would make the valuable contribution to housing supply at Fradley, would come forward. Smaller sites such as Land at Home Croft, Long Lane (SHLAA ref: 120) should form part of the supply at Fradley. It is submitted that a range of small to medium sized sites should be identified for housing in either the Fradley Neighbourhood Plan or an Allocations document in addition to the proposed strategic site at Hay End Lane. Land at Home Croft, Long Lane is suitable and available to come forward for residential development, is 0.7ha and is capable of accommodating up to 20 dwellings in a variety of design, type, size and tenure. Site is located outside of but adjacent to the village settlement boundary for Fradley.	Comments noted - A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed. Site in question would be considered via the neighbourhood plan process.

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LPRPO437	Philippa Kreuser (CT Planning) on behalf of Trustees of St Johns Hospital	Policy OSS2: Our spatial strategy	<p>Supports the identification of Lichfield City as the Level 1 Strategic Centre in the District.</p> <p>Land remaining within housing allocation L12 should be carried forward into the emerging Local Plan Period to 2040. Site is available and appropriate for development. It is not clear in the document how such housing allocations will be carried forward. No reference is made to the future situation in Lichfield City with the exception of the strategic allocation North of Lichfield for 3,300 dwellings. Provision should be made for smaller urban sites to be allocated in Lichfield City.</p> <p>Land at the former Lawn Tennis Club being the remaining undeveloped portion of Housing Allocation L12 should be retained as a housing allocation. Site is located within walking distance of the main retail area of the City, adjacent to a bus route, and located 250m west of Lichfield City Railway Station.</p> <p>Site is considered to be well suited for accommodating specialist housing given its relationship adjoining St John's Hospital.</p>	Comments noted - A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO438	Philippa Kreuser (CT Planning) on behalf of A Leedham	Policy OSS2: Our spatial strategy & Policy OHF1: Housing provision	<p>Object to the identification of Clifton Campville as a Level 5 - Smaller Rural Village as set out in Strategic Policy OSS2: Our Spatial Strategy. Clifton Campville supports a primary school, schools are a critical element of village life often sustaining the vitality and viability of settlements. Such villages should be supported by local planning policies to allow for small scale growth by way of a housing allocation rather than ad-hoc development. Consider Clifton Campville should be classified as a level 4 settlement.</p> <p>Object to Policy OHF1 which seeks to restrict housing development in level 5 settlements to infill development within the settlement boundary, rural exception sites, changes of use and sites identified in neighbourhood plans. OHF1 identifies some 200 dwellings to be distributed across the wider rural areas through neighbourhood plans. Preferred Options implies that the Council may seek to allocate housing sites where neighbourhood plans do not wish to take on this task but it is not clear how level 5 villages receive planned growth if they do not have a neighbourhood plan in the first instance.</p> <p>Local plan should seek to allocate small scale housing development to rural villages with no neighbourhood plans through a local plan allocations document and policies OSS2 and OHF1 should be amended accordingly. Plan should support housing developments which contribute to maintaining and enhancing the vitality and viability of rural villages. Site promoted by representation as one such site.</p>	Comments noted. Spatial Strategy within the preferred options considered appropriate. Policy provides for opportunities for local communities to identify sites within lower level villages.
LPRPO439	B.A. & L Smith	Policy SHA2: Strategic housing allocation land west of Fazeley	Object to the proposed development at Mile Oak for the following reasons; huge amount of Green Belt land being consumed; congestion on the Sutton Road in both directions through the traffic lights has become horrendous at peak times, sometimes with a mile of traffic queuing. This is due to people accessing the town centre and Ventura Park. The proposed development will only compound the problem; current traffic volume prevents us from leaving our property sometimes delaying us for 10 minutes; with over 900 new houses and approx. 1200 vehicles this will destroy the nature of the current villages.	Comments noted. Policy SHA2 includes requirement for appropriate infrastructure as part of the development of the site.
LPRPO440	Graham Armitt	Whole document	<p>Against the proposed ADR status of green belt parcels in Burntwood. More houses of this quantity in Burntwood would add further tremendous strain on the already non-existent infrastructure of Burntwood, and will add even further pollution. Area has already been utilised in the past for overspill housing for Birmingham and the Black Country.</p> <p>Welcome policy NS1 accommodation high level growth outside the Green Belt.</p>	Comments noted - The document identifies areas of 'Safeguarded Land' as defined within national policy. National policy states that consideration should be given that where changes to the Green Belt boundary are being proposed then areas of land between the urban area and the Green Belt (Safeguarded Land) should be identified to ensure the Green Belt boundary is capable of enduring beyond the plan period. The preferred options document identifies areas of such safeguarded land in conformity with national planning policy.
LPRPO441	Stacey Green (Barton Willmore) on behalf of Church Commissioners England	Policy OSS2 : Our spatial strategy	We support the settlement hierarchy in so much that it recognises Burntwood as the second most sustainable settlement outside of Lichfield with Level 2 – 'Other Main Centre' status. However, whilst the settlement hierarchy recognises the sustainability credentials of Burntwood this is not reflected in terms of strategic allocations. There does not appear to be any supporting explanation within the current draft Plan, or in the published evidence base provided alongside the draft Plan.	Comments noted - Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed. A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.

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LPRPO442	Philippa Kreuser (CT Planning) on behalf of Mr J Duncan	SHA4: Strategic housing allocation land of Huddlesford Lane	<p>Supports the identification of Whittington as a Level 3 Larger Service Village in the settlement hierarchy set out in Policy OSS2 as Whittington is a most sustainable location for new development. Supports the identification of Whittington as location for a new strategic housing allocation. Given Whittington's sustainable credentials and its Level 3 settlement status it is submitted that Whittington could accommodate a greater number of houses than the 75 dwellings proposed in Policy OHF1: Housing Provision. The emerging plan sets out considerably more dwellings to be provided for in other Green Belt Level 3 Settlements such as Armitage with Handsacre, Shenstone and Fazeley, therefore housing provision should be increased in Whittington to be consistent with its related key settlements.</p> <p>Objects to Policy SHA4. Submitted that any housing allocations to the village would be more appropriately located if dispersed around the settlement. A number of smaller sites around the periphery of the village could be better absorbed, less intrusive and lead to fewer traffic impacts when compared to a large allocation of 75 dwellings in one location.</p> <p>A site suitable and available to be allocated for housing is Land to the East of Common Lane (SHLAA ref: 226), it is within easy walking distance of all services and facilities in Whittington. Furthermore, Common Lane serves as a public transport route. Site comprises of 0.77ha and could deliver 27 dwellings at 35dph. The site lies adjacent to the settlement boundary and could be released from the Green Belt without harming the functions of the Green Belt. There is also opportunity within the site to provide some off street car parking to serve the adjacent primary school.</p> <p>This site along with Land at Church Farm, Back Lane (SHLAA ref: 273) which can deliver 41 dwellings could if both were allocated deliver the proposed strategic requirement of 75 dwellings to Whittington but with less environmental impact to the village.</p>	<p>Comments noted - Policy SHA4 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.</p>
LPRPO443	Stacey Green (Barton Willmore) on behalf of Church Commissioners England	Policy ONR1: Green Belt	<p>We are of the view that the Local Plan review treats Green Belt release as a last resort with a disproportionately low share of the District's houses being assigned to Burntwood. However, paragraph 136 of the NPPF provides the opportunity to alter Green Belt boundaries where exceptional circumstances exist, through the preparation or updating of plans.</p> <p>We consider there are the exceptional circumstances to justify changes to the Green Belt boundaries in Lichfield District including the development needs of Lichfield District and the unmet housing needs of the Greater Birmingham and Black County Housing Market Area in a District that has limited urban capacity and to establish a sound spatial strategy.</p> <p>The Local Plan Review does not appear to explicitly set out the exceptional circumstances required to justify any changes to Green Belt boundaries. We would recommend that the exceptional circumstances to justify Green Belt boundary changes are included in the Local Plan Review.</p> <p>Given the accepted need for Green Belt release we consider that the distribution of development and selection of sites across the District should progress without prejudice to their siting in the Green Belt, and progress having regard to Paragraph 138 of the NPPF; which requires LPA's, when reviewing Green Belt boundaries, to take account of the need to promote sustainable patterns of development and channel development towards urban areas inside the Green Belt boundary.</p> <p>The Commissioner's sites have been assessed collectively by the Council under parcel B7 (see appendices). We disagree with the conclusions of the Council's Green Belt Review in respect of the assessment of parcel B7.</p> <p>The second paragraph to Strategic Policy ORN1: Green Belt requires development within the Greenbelt to retain its character and openness. At paragraph 133 the NPPF is clear that the fundamental aim of Green Belt policy is to keep land permanently open, however the retention of character is not referred to. As such this policy requirement is onerous, unjustified and fails to comply with national policy. We request that this requirement is omitted from the policy.</p> <p>The policy allows for 'non-strategic' changes to the Green Belt boundary which do not have a fundamental impact on the spatial strategy. However, it is unclear what level of development may be considered 'non-strategic' to qualify for consideration against this policy. Certainty on this point is essential given the number of homes proposed for allocation in the Green Belt through neighbourhood plans.</p>	<p>Comments noted - The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.</p> <p>Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.</p> <p>The document identifies areas of 'Safeguarded Land' as defined within national policy. National policy states that consideration should be given that where changes to the Green Belt boundary are being proposed then areas of land between the urban area and the Green Belt (Safeguarded Land) should be identified to ensure the Green Belt boundary is capable of enduring beyond the plan period. The preferred options document identifies areas of such safeguarded land in conformity with national planning policy.</p>
LPRPO444	Stacey Green (Barton Willmore) on behalf of Church Commissioners England	Policy OHF2: Providing a balanced housing market and optimising housing density	<p>Strategic Policy OHF2 expects new housing development to achieve a minimum density of 35 dwellings hectare, and for development with good public transport links to achieve higher densities of approximately 50 dwellings per hectare. We object to this requirement. Given the nature of the District and the range of sites for allocation, we consider a specific density requirement across all sites would prevent the character of a place and its setting to be fully considered. Further, the Council should consider the ability of developers to manage and design schemes taking into account factors such as viability as well as potential occupiers; flexibility is therefore needed when considering density of schemes.</p>	<p>Comments noted - and will be reviewed.</p>
LPRPO445	Stacey Green (Barton Willmore) on behalf of Church Commissioners England	Policy OHF4 : Affordable housing	<p>It is understood that ahead of the Regulation 19 consultation (anticipated in May 2020) the council will undertake further viability testing to identify an appropriate rate of affordable housing to be applied on qualifying sites. We reserve the right to comment on the rate of affordable housing at this time.</p>	<p>Comments noted</p>

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO446	Stacey Green (Barton Willmore) on behalf of Church Commissioners England	Our vision for Burntwood	<p>As set out under our comments on the spatial strategy and housing provision, we object to the number of dwellings proposed for Burntwood. Since Burntwood is evidentially the second most sustainable settlement outside of Lichfield City, more than 840 dwellings should be proposed here and less dwellings proposed across the lower level settlements.</p> <p>An increase in housing provision at Burntwood would also have the benefit of increased developer contributions that could be used to invest in the town centre and improve social infrastructure, which we understand to be two of the town's key issues.</p> <p>We object to the proposed approach for the Burntwood Neighbourhood Plan to identify sites for almost half of Burntwood's housing provision (400 dwellings). Given the advanced stage of the Burntwood Neighbourhood Plan (which will proceed to referendum if approved at Cabinet on 10th March 2020), this is likely to be 'made' by mid-2020. Thus, the Burntwood Neighbourhood Plan will be 'made' before the Local Plan review is adopted (anticipated February 2022).</p> <p>On the basis that the Neighbourhood Plan will be less than 2 years old when the Local Plan review is adopted, we have concerns relating to the Town Council's aspirations to review the Plan in a timely manner; particularly when there is no policy requirement to review a neighbourhood plan, and there is no cut-off date in the Local Plan for the identification of sites.</p> <p>Accordingly, we have concerns that the approach in the Local Plan review will lead to significant delays in housing delivery. If sites are available and deliverable, they should be allocated now.</p>	Comments noted - The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO447	Stacey Green (Barton Willmore) on behalf of Church Commissioners England	Whole document	<p>The Council's Strategic Housing Land Availability Assessment 2019 assesses the Commissioner's sites under SHLAA ID references 279 (southern parcel) and 280 (northern parcel). Both sites are categorised as developable and considered likely to come forward for development in the next 6 -10 years. The sites have also been assessed in the Council's Housing Site Selection Paper 2019. At Appendix B: Detailed Site Assessment Criteria we note that both sites have been given an 'amber' rating in respect of flood risk, however the sites are located entirely within flood zone 1. We ask that the sites' assessment against flood risk be amended to reflect the assessment criteria and the scoring changed to 'green'. We also note some discrepancies in respect of the scoring for the northern site (ID 280). The site has been given an 'amber' rating against the ancient woodland category however the site is not located within or adjacent to ancient woodland. The site should be awarded a 'green' rating in accordance with the Commissioners site to the south (ID 279). The northern site has also been given a 'red' rating against biodiversity which, according to the Council's criteria means that the site performs an important function for biodiversity. We disagree with this assessment. Whilst the site falls within the Cannock Chase Special Area of Conservation (SAC) and is adjacent to a Site of Special Scientific Interest (SSSI) we consider an 'amber' rating would be more appropriate and consistent with the biodiversity scoring for the Commissioners south site (ID 279). We note that any adverse impacts on biodiversity as a result of development at the Commissioner's sites can be fully mitigated with careful design and / or compensated. We request that all inconsistencies noted above be amended to accurately reflect the character of the sites.</p> <p>Bleak House is available, deliverable and achievable. Development of the Sites will constitute sustainable development given their location, immediately adjacent to the sustainable town of Burntwood. The Sites could provide a logical extension to this principal urban area by utilising the existing infrastructure, services, amenities and facilities.</p>	Comments noted - The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO448	Samantha Peace	Whole document	<p>Traffic is an issue on Hospital Road, Burntwood Bypass is used by no-one. Flooding at the bottom of Hospital Road that will get worse with no natural drainage. Have to wait a month for a doctors appointment.</p> <p>Green Belt land is disappearing for profit, displacement of wildlife.</p>	Comments noted. The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO449	Liz Boden (Pegasus) on behalf of Buildings by Bespoke Ltd	Policy ONR1: Green Belt	<p>Policy ONR1 refers to "further non-strategic changes to the Green Belt boundary which do not have a fundamental impact on the spatial strategy may be appropriate for all settlements within the Green Belt. The precise boundaries of such changes will be determined through neighbourhood plans or the allocations document". No defined settlement boundary for Burntwood which is inconsistent with the treatment of other settlements that lie within the Green Belt nevertheless it is clear that the settlement boundary for Burntwood is effectively the Green Belt boundary around the settlement.</p> <p>117 Norton lane, Burntwood lies within Green Belt with the sites eastern boundary abutting the built up area of Burntwood. Site contains a dwelling and outbuildings and therefore it doesn't perform any of the purposes of Green Belt. Considered exceptional circumstances exist for releasing the site from Green Belt, which would extend the built up area boundary around the existing site. Site is put forward for consideration through the Call for Sites process for net 1 additional dwelling.</p>	Comments noted - Green Belt Review 2019 makes clear that 'exceptional circumstances' would need to be demonstrated if changes to the Green Belt boundary are proposed. This has been judged to be the case in the preferred options document as stated at paragraph 16.5 in terms of meeting development needs
LPRPO450	A Casey	Policy SHA2: Strategic housing allocation land west of Fazeley	Object to proposed allocation within policy SHA2. As a long term resident traffic is at its worst with pedestrians struggling to cross the road - why are there not crossings in place? Impact on local ecology and wildlife by proposed development	Comments noted. Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO451	Hilary Horrobin	Policy SHA2: Strategic housing allocation land west of Fazeley	800 Houses within this location is problematic, the A453 is often congested. Cannot see how infrastructure will cope. Also why do we continue to build on green belt when the environment is such a significant issue.	Comments noted. Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.

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LPRPO452	Luke Walker (Lichfield & Hatheron Canals Restoration Trust)	Chapter 5: Profile of the District & Figure 5.1	<p>Pleased to note the inclusion of the map of the projected route for the Lichfield Canal and will be pleased to comment further on plans for Infrastructure Development.</p> <p>The actual line on the map in Figure 5.1 does not align very closely with the actual route - the Policies map shows the protected route on the correct alignment, within the constraints of the scale adopted for publication.</p>	Comments noted - will review
LPRPO453	Luke Walker (Lichfield & Hatheron Canals Restoration Trust)	Chapter 5: Profile of the District & Figure 5.1	<p>Typographical error in the name of organisation in paragraph 5.33 - there should be an 's' after 'Canal' as the organisation are concerned with both the Lichfield Canal and the Hatheron Canal - the two are not directly related.</p> <p>Paragraph 5.37 should also include a specific reference to the project to restore the Lichfield Canal as this initiative is also expected to bring benefits to the community and the environment during the period of currency of the Plan.</p>	Comments noted
LPRPO454	Steve Horrobin	Policy SHA2: Strategic housing allocation land west of Fazeley	800 Houses within this location is problematic, the A453 is often congested. Cannot see how infrastructure will cope. Also why do we continue to build on green belt when the environment is such a significant issue.	Comments noted. Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO455	Luke Walker (Lichfield & Hatheron Canals Restoration Trust)	Chapter 7: Our Vision	Welcome the words in this Vision Statement regarding the availability of the Canal Network in the district as a route for alternative (and environmentally sustainable) modes of transport. Understood this to include the opportunities offered by sections of the Lichfield Canal and Heritage Towpath Trail as planned and as completed during the period of the Plan.	Comments noted and acknowledged
LPRPO456	Luke Walker (Lichfield & Hatheron Canals Restoration Trust)	Policy OSC1: Securing sustainable development	<p>Welcome the inclusion in OSC1 of measures to develop Green Infrastructure – which we understand includes our project to restore the Lichfield Canal.</p> <p>We note the intention to do work to alleviate flood risk, as set out in policy OSC1 and expect that opportunities in this direction arising from the restored Lichfield Canal will be fully considered; and implemented where appropriate. We feel that paragraph 10.37 should specifically mention the Canal.</p> <p>We note that Lichfield District Council are working with the Environment Agency on a Strategic Flood Risk Assessment for the District and would be pleased for them to contact us to ensure appropriate consideration is given to the contribution of our work to restore the Lichfield Canal as a mechanism for mitigating flood risk.</p>	Comments noted and acknowledged
LPRPO457	Luke Walker (Lichfield & Hatheron Canals Restoration Trust)	Policy OSR2: Open Space and Recreation	<p>Welcome the provisions regarding open space for public recreation and the intention to support such initiatives such as the Trust work to restore the Lichfield Canal. Canal project does need specific route protection – including space for batters and for navigable headroom above the restored water channel – for the potential benefits of our proposals to be achieved.</p> <p>Note LDC are working on a Green Infrastructure Study and look forward to being invited to present proposals for inclusion in that study.</p>	Comments noted - Green infrastructure evidence currently being worked on
LPRPO458	Luke Walker (Lichfield & Hatheron Canals Restoration Trust)	Policy ONR4: Green infrastructure and connectivity	<p>Welcome the specific mention of the organisation in this context and would be pleased to hear more about the support that Lichfield District Council intends to contribute to the work to restore the Lichfield Canal.</p> <p>Strongly welcome the provisions in policy ONR4 that carry forward the route protection included in Policy IP2 in the current Adopted Local Plan Allocations 2008 – 2029. Considers it would be helpful for this to be set in context with similar paragraphs of explanatory text as was included in the Adopted Local Plan Allocations 2008 – 2029.</p> <p>Referring to the likelihood of development alongside the Fossey Lane and consider it necessary for the following words to be added to policy ONR4 to make it completely clear that developers will be required to include for the canal when applying for consent for developments close to the canal: 'Development on or adjacent to the route should provide any infrastructure necessary to maintain the integrity of the route – including provision of bridges with appropriate headroom for walkers on the towpath and for boats on the canal'.</p>	Comments noted and acknowledged
LPRPO459	Luke Walker (Lichfield & Hatheron Canals Restoration Trust)	Policy SHA4: Strategic housing allocation land of Huddlesford Lane	<p>Note with interest the allocation of a site at Huddlesford Lane, Whittington, for housing development. Highlights the proximity of this location to the line of the Lichfield Canal and the opportunity for a sustainable transport route linking this development with Lichfield city by means of the towpath alongside the historic Coventry Canal and the planned extension of the Heritage Towpath Trail alongside the restored Lichfield Canal.</p> <p>Trust that the organisation will receive support from any CIL or Section 106 funds associated with the planned housing development.</p>	Comments noted - Policy SHA4 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO460	Luke Walker (Lichfield & Hatheron Canals Restoration Trust)	Whole document & Policies maps	Pleased to note the protected route for the restored Lichfield Canal has been shown on the main Lichfield District Local Plan Policies Map and can confirm that it is correctly shown within the accuracy possible at the chosen scale for this publication.	Comments noted

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LPRPO461	Marc Hourigan (Hourigan Connolly) of behalf of Anwyl Land	Policy OSS2:Our spatial strategy	<p>In respect of Burntwood the strategy of not allocating any strategic sites, or any sites at all for housing means that the strategy of the Plan, as expressed through the spatial strategy, does not seek to meet the area's objectively assessed needs. Consequently, the Plan is not positively prepared.</p> <p>Strategic sites should be identified in Burntwood in the same way as they have been for Level 3 settlements (which incidentally have also given a commitment to neighbourhood planning). The justification given that the Council wants to give local people a say on where new housing is to be located is simply not credible given the approach adopted in Level 3 settlements to strategic development.</p> <p>In any event inappropriate levels of growth are being directed to Level 3 settlements compared to Burntwood which is a higher order Level 2 settlement. The approach is simply not justified given opportunities to release land for housing in Burntwood.</p> <p>Land north of Rake Hill, Burntwood should be removed from the Green Belt and allocated for circa 200 dwellings. Consequential amendments to the text of Strategic Policy OSS2 are therefore required. Additionally, the strategic housing allocations a Fazeley, Fradley and Whittington should be deleted and retained as Green Belt/countryside as appropriate.</p>	Comments noted - The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents. Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO462	Marc Hourigan (Hourigan Connolly) of behalf of Anwyl Land	Policy NS1: New settlement	<p>There is very little detail in the Preferred Options Local Plan Review on the proposed new settlement in terms of location, and contribution of dwellings to the proposed Plan period to 2040. However, a new settlement may not be required particularly when there are locations around the Level 2 settlement of Burntwood that would be suitable for housing and which would not require the significant infrastructure provision a new settlement would. Further clarification is required regarding the role of a new settlement within the Local Plan Review Plan period.</p>	Comments noted and acknowledged .
LPRPO463	Marc Hourigan (Hourigan Connolly) of behalf of Anwyl Land	Policy OHF1: Housing Provision	<p>Welcome the housing figure set out in Policy OHF1 being expressed as a minimum figure for the period 2018 – 2040. However, we are concerned about how the Council will deliver at least 11,800 homes over the Plan period.</p> <p>Notwithstanding the above we do have concerns with regard to the delivery of some of the strategic allocations by 2040. As things stand there appears to be no supporting evidence to justify lead in times and delivery rates for the 3,300 dwelling strategic allocation north of Lichfield.</p> <p>The Council will need to produce detailed delivery evidence in support of this allocation otherwise the claimed 3,300 dwellings to be delivered here over the Plan period simply isn't justified.</p> <p>The absence of lead in and delivery rates information for strategic allocations as noted above and the absence of any reference to Burntwood, land to be allocated for residential development in the settlement (including the release of Green Belt land) and the overall distribution of development amongst the settlements/areas</p> <p>The rejection of growth also cannot be based on the availability of facilities in Burntwood to meet development needs either as mitigation can be planned into development proposals and an increase in population will help support local services and assist with regeneration of the town centre.</p> <p>Land north of Rake Hill, Burntwood should be removed from the Green Belt and allocated for circa 200 dwellings. Consequential amendments to the text of Strategic Policy OHF1 are therefore required. As noted above the site could simply be allocated and the numbers added to the total given that the housing requirement is a minimum or numbers could be redistributed from Level 3 and 5 settlements</p>	<p>Comments noted - Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review.</p> <p>The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period.</p> <p>A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.</p> <p>The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.</p> <p>Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.</p>
LPRPO464	Marc Hourigan (Hourigan Connolly) of behalf of Anwyl Land	Policy OHF4 : Affordable housing	<p>OBJECT - Policy OHF4 does not contain a percentage requirement for affordable housing as part of open market schemes. In that respect Paragraph 34 of the Framework requires Plans to set out the contributions expected from developers including inter alia the levels and types of affordable housing provision required. Clearly the Council will need to ensure that its strategic housing allocations are viable with a percentage of affordable housing specified in Policy OHF4. A percentage rate for affordable housing should be specified in the policy.</p>	Comments noted - Evidence within the HEDNA suggests the Council will be justified in seeking to achieve as much affordable housing as viably possible on appropriate development sites. Further viability evidence is being collected which will inform the policy and provide a clear position in terms of the appropriate level of affordable housing to be sought.

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LPRPO465	Marc Hourigan (Hourigan Connolly) of behalf of Anwyl Land	Policy ONR1: Green Belt	<p>OBJECT to Policy ONR1</p> <p>The Council's approach to the Green belt as expressed in Strategic Policy ONR1 when considered in the context of Strategic Policy OHF1 is frankly baffling.</p> <p>Firstly, in the context of Burntwood land at Coulter Lane is proposed to be removed from the Green Belt and designated as an Area of Development Restraint. That term is not found anywhere in the Framework. If what the Council really means is safeguarded land (as defined in Paragraph 139 of the Framework) then they really ought to just use that term.</p> <p>Question of what is and what is not a strategic housing site when considering sites in the Green Belt context. In that respect the Council consider the four allocations made in the Local Plan Review to be strategic in nature (see Paragraph 1.3 of the Preferred Options document to name but a few references). The sites in question that utilise existing Green Belt land range from 75 dwellings in Whittington to 800 dwellings at Fazeley so 75 dwellings must represent a strategic site. In that respect Burntwood has to find 400 dwellings through new allocations (there are already said to be 438 dwellings on allocations or with planning permission on sites identified in the Local Plan Strategy and Allocations Document). That number of new dwellings can only be found through the release of Green Belt land given that the settlement is surrounded by such land and there isn't the capacity from the urban area to provide a further 400 dwellings, notwithstanding that we object to the level of development to be directed to Burntwood anyway which is considered insufficient.</p> <p>Clearly the provision of housing in Burntwood is a strategic matter that should rightly be dealt with in the Local Plan Review. That approach is fully endorsed by Paragraph 20 of the NPPF.</p> <p>The Council needs to be clear that land at Coulter Lane is not going to be used in this Plan period. If that is the case then we have no objection to it being removed from the Green Belt and safeguarded in the Local Plan Review on the proviso that a strategic housing policy for Burntwood is introduced to the Local Plan Review which identifies where at least 400 new dwellings will be located on land that is currently within the Green Belt.</p>	<p>Comments noted - Green Belt Review 2019 makes clear that 'exceptional circumstances' would need to be demonstrated if changes to the Green Belt boundary are proposed. This has been judged to be the case in the preferred options document as stated at paragraph 16.5 in terms of meeting development needs and the identification of new Green Belt to the north of Lichfield City. The Green Belt Review provides a comprehensive strategic assessment of all parts of the green belt.</p>
LPRPO466	Marc Hourigan (Hourigan Connolly) of behalf of Anwyl Land	Policy B2: Burntwood environment	<p>OBJECT to Policy B2 specifically the following paragraph:</p> <p>"The landscape around the settlement of Burntwood is ideally placed to provide corridors and areas that connect existing designated important biodiversity sites. Development that requires off site mitigation will be focused within these areas, where appropriate".</p> <p>The above paragraph is poorly worded in that if it is the intention that developments requiring offsite mitigation will have such mitigation provided on land surrounding the settlement then there is no guarantee that this could be delivered on land not within an applicant's control. Suggest that the above paragraph is deleted.</p>	<p>Comments noted</p>
LPRPO467	Marc Hourigan (Hourigan Connolly) of behalf of Anwyl Land	Chapter19: Burntwood	<p>As noted in previous Chapters we OBJECT to the absence of a strategic housing allocation policy for Burntwood such a policy should identify where at least 400 new dwellings will be located on land that is currently within the Green Belt, notwithstanding that there is a credible argument that further levels of development should be proposed for the settlement re-directed from Level 3 settlements. As noted in the earlier chapters we are firmly of the view that circa 200 of those dwellings should be located on our client's site north of Rake Hill.</p> <p>A strategic housing policy for Burntwood is sought with land north of Rake Hill, Burntwood being removed from the Green Belt and allocated for circa 200 dwellings. In terms of delivery the Council could expect the site to be delivered in full within 5 years of adoption of the Local Plan Review.</p>	<p>Comments noted</p>
LPRPO468	Marc Hourigan (Hourigan Connolly) of behalf of Anwyl Land	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>OBJECT to the proposed strategic housing allocation west of Fazeley on the basis that growth should be directed to the higher order centre of Burntwood. It should also be noted that in the Council's Green Belt Review only part of the site was considered (being given a moderate classification) with further land to the west being classified as part of a broader area and being classified as important.</p> <p>Strategic Policy SHA2 is unsound because the approach adopted of locating development here is not justified given the reasonable alternatives i.e. allocating land for development in Burntwood which is a higher order settlement.</p>	<p>Comments noted the Green Belt Review provides a comprehensive strategic assessment of all parts of the green belt. The four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.</p>
LPRPO469	Marc Hourigan (Hourigan Connolly) of behalf of Anwyl Land	Policy SHA3: Strategic housing allocation land north and south of Hay End Lane, Fradley	<p>OBJECT to the proposed strategic housing allocation on land north and south of Hay Lane, Fradley on the basis that growth should be directed to the higher order centre of Burntwood and specifically land north of Rake Hill, Burntwood.</p> <p>Strategic Policy SHA3 is unsound because the approach adopted of locating development here is not justified given the reasonable alternatives i.e. allocating land for development in Burntwood which is a higher order settlement.</p>	<p>Comments noted - The four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.</p>

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LPRPO470	Marc Hourigan (Hourigan Connolly) of behalf of Anwyl Land	Policy SHA4: Strategic housing allocation land of Huddlesford Lane	OBJECT to the proposed strategic housing allocation west off Huddlesford Lane Whittington on the basis that growth should be directed to the higher order centre of Burntwood and specifically land north of Rake Hill, Burntwood. It should also be noted that in the Council's Green Belt Review the site was given a moderate classification; in other words it scores no better than our client's site, however it is in a lower order settlement and in the absence of any release of Green Belt for housing in Burntwood through the Local Plan Review we object to the allocation of the Whittington site. Strategic Policy SHA4 is unsound because the approach adopted of locating development here is not justified given the reasonable alternatives i.e. allocating land for development in Burntwood which is a higher order settlement.	Comments noted - The four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO471	Ann Anderson	Policy ONR1: Green Belt	Burntwood doesn't have appropriate infrastructure to cope with any further growth.	Comments noted - The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO472	Peter Thomson	Policy SHA2: Strategic housing allocation land west of Fazeley	I am amazed that the land at Mile Oak is being considered for 800 homes. Traffic along Sutton Road is already unbearable with cars travelling to Ventura Parl. Drayton Manor and local traffic. There is often queues with traffic backing up from the A5. Concern as road is a corridor for ambulances travelling between hospitals. Parking at Fazeley is impossible the thought of more houses will cause chaos to an already congested area. Tamworth are building a large estate nearby I fear this will increase traffic especially at rush hour. The thought of another estate using the same roads is beggars belief. Thrust of the vision is supported. Support the aim of growth and the district contributing toward unmet needs.	Comments noted. Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy..
LPRPO473	Darren Bell (David Lock Associates) on behalf of Tarmac	Chapter 7: Our vision	Suggested however the vision is amended to remove reference to Green Belt release as consider this is not required. No clear case of exceptional circumstances especially where there is a reasonable alternative beyond the Green belt. Support reference in vision to a new settlement to meet longer term needs but suggest this also refers to new village meeting needs during the plan period. The vision should include reference to the reopening of the South Staffordshire rail line and a new rail station at Alrewas/National Memorial Arboretum.	Comments noted. Spatial strategy of the preferred options document would require some Green Belt release which is evidenced within the evidence base.
LPRPO474	Darren Bell (David Lock Associates) on behalf of Tarmac	Chapter 8: Our strategic objectives & priorities	Strategic Objective and Priority 1 should refer to the role a new sustainable village can play in supporting growth during the plan period.	Comments noted. Policy NS1 demonstrates support for the development of a new settlement within the District beyond the current plan period.
LPRPO475	Darren Bell (David Lock Associates) on behalf of Tarmac	Policy OSSR2: Our spatial strategy	Suggest Policy OSSR2 be amended to show a higher contribution toward meeting unmet needs of the HMA. Strategic Growth Study showed a shortfall of almost 60,000 dwellings. Lichfield District has accepted its duty to assist within this through this Local Plan Review process. The scale of contribution has been limited to 4,500 dwellings, combined with the District's own need means a housing figure of 11,782 it 536 per year. The approach taken by the Council does not fully reflect national policy of significantly boosting housing. It is relevant that the council has committed to delivering 890 dwellings per annum in the next five years. It is likely that further housing will be required for the period 2036-2040. It is suggested that as a minimum a further 1000 dwellings should be added to the contribution for the wider housing market area. with a total requirement increased to 12,800 (581 per annum).	Comments noted. The previous consultation document tested a range of options to assist in the delivery of unmet needs. The contribution of 4,500 within the Preferred Options is considered to be appropriate based on past levels of delivery. Additionally the GBHMA has previously published position statements which demonstrate the current level of unmet need.
LPRPO476	Darren Bell (David Lock Associates) on behalf of Tarmac	Policy OSSR2: Our spatial strategy	Strong case for the Council is allocate land at Alrewas Quarry as a new garden village. The site is outside of the Green Belt and can be developed outside of flood zones with no conservation landscape or heritage designations preventing development. Quarry is currently being worked for and gravel and development would only follow after the cessation of this. Clear vision to create a diverse and healthy new garden village. proposals include; approx. 1500 dwellings, including affordable and specialist housing; provision of land for railway station and park and ride; new infrastructure and green spaces for NMA; specialist housing and employment for former service personnel; new primary school; mixed use local centre; new parks and sports pitches; improved bus services and new cycle routes. Garden Village development can dovetail with the current and proposed mineral extraction and can deliver first new homes in years 6-10 of the plan period (first completions 2027/20228).	Comments noted. The proposed development is not included as a proposal within the Preferred Options document.
LPRPO477	Darren Bell (David Lock Associates) on behalf of Tarmac	Policy NS1: New settlement	Promote site as a strategic allocation within the plan period. Notwithstanding this if the council decides to plan for a larger new settlement to address longer term growth needs, regard should be had to the previous consultations. Previous consultation identified three broad locations: Thorpe Constantine which received objections from Tamworth Borough, Hopwas Parish, Clifton Campville Parish and Thorpe Constantine Parish council. It is constrained by a lack of infrastructure and is in the catchment area of the River Mease SAC and a mineral safeguarding zone; Location around Shenstone is in the Green Belt. The area of search around Fradley and Alrewas was previously promoted as Brookhay Villages for approximately 7,500 dwellings. The inspector did not recommend progressing the scheme in the Local Plan Strategy, he reflected it should be considered in the next review. Accordingly if the Council is minded to identify a broad location for a new settlement the Fradley and Alrewas area is the most suitable option of these already considered. This should not preclude the identification of Whitemoor Garden Village as a strategic site in this local plan. In this context it could be an early phase and catalyst to support the larger new settlement proposals.	Comments noted. The preferred options document includes a specific policy which seeks to support the identification of a new settlement(s) within the District to meet longer term development needs. At this stage the preferred options does not set out where such a proposal should be located.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO478	Darren Bell (David Lock Associates) on behalf of Tarmac	Policy OHF1: Housing provision	Principle of an allocation north-east of Lichfield is not contested but the effectiveness of the policy is questioned if the full 3,300 dwellings is assumed to be delivered within the plan period. No housing trajectory appears within the document. It is suggested the Council makes clear that the north-east of Lichfield allocation should be reduced to a more realistic figure of 2,300 homes within the plan period.	Comments noted. Housing trajectory would be included within the publication draft of the plan.
LPRPO479	Darren Bell (David Lock Associates) on behalf of Tarmac	Policy OHF1: Housing provision	Object to allocation land west of Fazeley because it is inconsistent with national policy and not justified. Should be deleted from the Local Plan Review. Case for exceptional circumstances has not been made and a reasonable alternative (the site promoted by the representation - land at Alrewas Quarry) exists outside of the Green Belt. Councils Green Belt Review does not provide sufficient evidence to justify the removal of the site from the Green Belt. Extent of the site is not consistent with the parcel within the Green Belt Review. Consider the proposed site as been unreasonably favoured in comparison to other options. Tarmac disagree with the scoring within the site selection paper.	Comments noted. Green Belt Review provides a comprehensive assessment of whole green belt through parcel and area assessments.
LPRPO480	Darren Bell (David Lock Associates) on behalf of Tarmac	Policy OHF2: Balanced housing market	Policy OHF2 should be amended to specifically refer to supporting specialist housing for former armed services personnel in a similar way the policy supports older persons and self/custom build housing. There is a specific opportunity to promote specialist housing and employment at Whitemoor Garden Village.	Comments noted. There is no statutory planning requirement to provide specific accommodation for former armed service personnel.
LPRPO481	Darren Bell (David Lock Associates) on behalf of Tarmac	Policy OST2: Sustainable travel	Policy should be amended to include reference to the reopening of the South Staffordshire line for passenger is and a new railway station at Alrewas/National Memorial Arboretum (NMA) together with a park and ride facility. The reopening of the line is supported by the West Midlands Combined Authority (WMCA), West Midlands Rail Executive (WMRE) and Staffordshire County Council (SCC). Adopted West Midlands Strategic Transport Plan 'Movement for Growth 2016 sets out long term strategy for transport serving the west Midlands. Station at Alrewas/NMA is identified within that document and represents the long term vision. West Midlands Rail Executive strategy identifies a station at the NMA/Alrewas as does the Staffordshire Rail Strategy. There is compelling evidence to suggest that the Council should amend policy OST1 to include an additional bullet point which offers support for the re-opening of the South Staffordshire railway line and a new station at Alrewas and the creation of new park and ride facilities.	Comments noted. The adopted Local Plan provides support for the reopening of the rail line. Consideration of such support to be given
LPRPO482	Darren Bell (David Lock Associates) on behalf of Tarmac	Policy OERT4: Tourism	Consider policy requires some amendments to overcome the conflict with proposed policy LC1. OERT4 makes reference to the recommendations within the Staffordshire Hotel and Visitor Accommodation Development Strategy 2019. This makes it clear that the NMA is a key draw for leisure stays. This is clear and robust evidence that hotel or alternative accommodation is needed to support leisure stays around the NMA. Tarmac don't consider current drafting of policy does enough to support the delivery of visitor accommodated around the NMA as it will inevitably fail the sequential test required by LC1. Suggest the following should be added: "Developments connected with these existing local and national tourism attractions may submit 'tourism conformity statements' in replace of a sequential test as per Policy LC1, given the location of these tourism attractions lying outside defined settlements".	Comments noted. Consider the current policy wording is appropriate and provides sufficient flexibility. Sequential test is required by national planning policy.
LPRPO483	Darren Bell (David Lock Associates) on behalf of Tarmac	Policy ORN1: Green Belt	Disagree that there is a strategic need to make changes to the Green Belt boundary to accommodate growth. The extent of the proposed allocation has not been fully assessed within the Green Belt Review. Council should review the planning judgement which has led to changes to the Green Belt boundary. Policy should be amended to remove reference to a strategic need to make changes to the Green Belt boundary	Comments noted. Preferred options document concludes that there is a strategic need to make changes to the Green Belt boundary within the plan period. This is based on consideration of the evidence including the Green Belt Review.
LPRPO484	Darren Bell (David Lock Associates) on behalf of Tarmac	Whole document	Representation relates to site selection paper 2019. Objects to the paper as the site promoted by tarmac has been incorrectly assessed. Have undertaken a reassessment which is attached to full representation. The reassessment shows that Alrewas Quarry site performs well against the selection criteria and the inclusion of the site for housing and mixed-use development would be justified.	Comments noted. Assessments within the site selection paper 2019 are considered to be consistent.
LPRPO485	Darren Bell (David Lock Associates) on behalf of Tarmac	Whole document	Representation relates to the sustainability appraisal. Object to the Sustainability Appraisal as the site promoted by Tarmac has been incorrectly assessed. Have undertaken reassessment using the criteria within the Councils SA. Consider given this assessment the Alrewas Quarry proposal should be reviewed and considered for allocation ahead of the next local plan consultation. The reassessment shows that Alrewas Quarry performs well against the selection criteria and the inclusion of the site for housing and mixed-use development would be justified.	Comments noted. Assessments within the sustainability appraisal are considered to be consistent.
LPRPO486	Judith Talbot	Policy SHA2: Strategic housing allocation land west of Fazeley	OBJECT to the proposed strategic housing allocation on the land west of Fazeley due to the excessive amount of building taking place on green belt areas of Tamworth. There is also no consideration for infrastructure, schools, medical facilities or the amount of pollution that will increase.	Comments noted. Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO487	Vicky Hyden	Whole document	Object to development on the Green Belt, specifically within Hammerwich. There is insufficient infrastructure to cope. Particularly on the roads and flooding.	Comments noted, no development proposed within Hammerwich.
LPRPO488	Jo Hutchison	Whole document	Further detail regarding pedestrian and cycle connectivity will function within the proposed new allocations for housing. Without high quality dedicated routes it will be a challenge to encourage residents to use more sustainable modes of transport which will benefit the environment as well as the health and well being of residents	Comments noted and acknowledged.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO489	Amanda Pullen	Whole Document	<p>Object to proposal to build 1300 homes in Hospital Road and Norton Lane, Burntwood.</p> <p>Land is Green Belt and should be preserved, damage to wildlife will be irreversible. Area not able to sustain such a large development. Insufficient school space, lack of doctors.</p> <p>Services are substandard electric substations are elderly and prone to power outages, sewerage network is old. Stream running through Hospital Road reaches just below the level where it floods.</p> <p>Insufficient parking in area as young people are unable to afford to leave home. Plenty of redundant business premises and empty homes that could be used for housing. No work in Burntwood meaning people have to travel by car.</p> <p>Understand need to build more houses but no need to ruin a small town/ bordering on village and the views residents enjoy.</p>	<p>Comments noted. The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.</p>
LPRPO490	S Hateley	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>Built up areas are not a good environment for people. The site may be able to provide a new school but has this been discussed with the county council education authority. The crossroads at Mile Oak cannot cope with any further traffic, and it will have an impact on the health of the local community. Doctors and dentists are also in short supply.</p>	<p>Comments noted, Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.</p>
LPRPO491	John Pullen	Whole Document	<p>Object to proposal to build 1300 homes in Hospital Road and Norton Lane, Burntwood.</p> <p>Land is Green Belt and should be preserved, damage to wildlife will be irreversible. Area not able to sustain such a large development. Insufficient school space, lack of doctors.</p> <p>Services are substandard electric substations are elderly and prone to power outages, sewerage network is old. Stream running through Hospital Road reaches just below the level where it floods.</p> <p>Insufficient parking in area as young people are unable to afford to leave home. Plenty of redundant business premises and empty homes that could be used for housing. No work in Burntwood meaning people have to travel by car.</p> <p>Understand need to build more houses but no need to ruin a small town/ bordering on village and the views residents enjoy.</p>	<p>Comments noted. The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.</p>
LPRPO492	Denis Rawlins	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>Concerns regarding the review of the Green Belt in Mile Oak, Fazeley and Bone Hill. The change in method of assessing areas recommended by Arup has meant some of the areas have been reassessed as moderate which may result in future building development in these areas. Concerned that once development is permitted to the west of A453 (Parcel FZ1) the development is more likely to grow in the near future.</p> <p>If SHA2 is subject to development, the already congested Mile Oak crossroads on the A453 will be worse. Travel times will be even longer with an increase of 800 homes.</p> <p>Interested to know Tamworth Borough Councils response to the consequences of such a large developments on one of the major roads in and out of the town.</p>	<p>Comments noted. Policy SHA2 includes requirement for appropriate infrastructure as part of the development of the site. The loss of Green Belt and countryside is justified through the evidence.</p>

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO493	Clare Tucker	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>Firmly opposed to this allocation and any variation of the proposed development on the site at Mile Oak. Do not destroy our precious Green Belt.</p> <p>There has been poor communication from Lichfield District Council to Fazeley residents in relation to this proposal, we have as a community taken it upon ourselves to ensure that all residents have been made aware of the plans and the deadline to submit comments. Ask that you ensure we are made fully aware of each stage of the process regarding this development and any future proposals that would impact our lives. Surely there are plenty of Brown Field and other sites that could be used? The proposal to build 800 dwellings is completely at odds with the current size of Fazeley which consists in total of approximately 1900 dwellings. A development of this size is completely out of proportion for such a small residential area.</p> <p>The land is for Lichfield District Council conveniently located right on the boundary of the jurisdiction, the requirement for supporting amenities, infrastructure and the wider consequences to local residents will fall within Tamworth Council's remit.</p> <p>Fazeley is a linear conurbation. For those of us living at the far corners in Mile Oak where this development would be located, it is a 15-20 minute walk to the centre of Fazeley Adding the development in the proposed location will therefore mean the same challenges for new residents but will extra challenges due to the additional number of people travelling around in various forms of transport.</p> <p>The significant impact that this development will have on traffic cannot be underestimated. Infrastructure is insufficient.</p> <p>HS2 construction is less than half a mile up the road from the proposed site and will impact the local residential area in a negative manner.</p> <p>Significant developments happening within the locality as Dusntall Park, has this been taken into consideration in terms of the wider infrastructure? Whilst proposals of this size will no doubt reference the provision of extra amenities, the reality in my experience is that this never materialises. A development of this size will fundamentally ruin the rural feel of Fazeley, not just the loss</p>	Comments noted. Policy SHA2 includes requirement for appropriate infrastructure as part of the development of the site. The loss of Green Belt and countryside is justified through the evidence.
LPRPO494	Christopher Hancox	Whole document	<p>Opposed to proposed Haworth development on the Green Belt between Burntwood and Hammerwich, it will destroy the distinct character of a village that's recorded history goes back a thousand years.</p> <p>Lived entire life overlooking the fields where I can see the spires of Lichfield Cathedral and have seen various species of animal. Green Belt forms an important nature corridor between Cannock Chase and Chasewater.</p> <p>Disappointed at lack of consultation for local residents.</p>	Comments noted. The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO495	Wendy Taylor	Whole document	<p>Object to any development on the present Green Belt around Hammerwich and Burntwood. Hammerwich would lose its character if development were to take place between it and Burntwood. Important to preserve village heritage.</p> <p>Any development around Burntwood cannot be classed as 'sustainable' as the services in the area are inadequate with the odd bus service. Lanes out of Hammerwich towards the West Midlands Conurbation are very narrow and not suited to the current amount of traffic never mind anymore.</p> <p>Area between Overton Lane and Burntwood Road has many springs which increase the problems of flooding in Hammerwich village.</p>	Comments noted. The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO496	Simon Linford - Czero	Chapter 6: Issues	<p>Delivering housing that is affordable locally has been an aspiration in previous Local Plans, but performance has always fallen well short, largely due to site values expected. Positive planning policies, support and requirements relating to sites coming forward are needed to promote and encourage the delivery of the quantity of affordable housing and other specialist housing such as custom build. Measures to encourage local affordability and requiring some discounted starter homes would help. Sites allocated for custom build are absent from the plan which discourages this type of delivery.</p>	Comments Noted and acknowledged
LPRPO497	Simon Linford - Czero	Chapter 8: Our Strategic objectives & priorities	<p>Strongly support the strategic aims of the Local Plan Review Preferred Options in relation to Sustainable communities (1), Rural communities (2), Climate Change (3), Sustainable transport (5), Meeting Housing need (6) Health and safe lifestyles (11), Countryside Character (12), Natural resources (13), Built environment (14) and High quality development (15).</p>	Comments Noted
LPRPO498	Simon Linford - Czero	Chapter 9: Our spatial strategy	<p>Support OSS2 with growth on centres and larger strategic villages. Suggest allocation of 75 units in Whittington is supplemented with a smaller allocation to provide more variety of housing, helping to meet specialist local needs.</p>	Comments Noted and acknowledged
LPRPO499	Simon Linford - Czero	Policy NS1: New settlement	<p>Note that it is not envisaged that homes will be delivered within the new settlement until the end of the existing plan period (2040). We are therefore concerned that without specific custom build site allocations before this date the local authority will be falling short in its requirements to conform to the NPPF.</p>	Comments Noted

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO500	Simon Linford - Czero	Chapter 10: Our sustainable communities	<p>Within policies OSC1 and OSC4 there are 'aspirations' in relation to sustainable dwelling design, energy efficiency, renewable energy, enhancing biodiversity, electric cars and low carbon design - strongly agree with these aspirations. If the Council intends to "ensure that all new development schemes are designed to maximise energy efficiency" it will need to define that level of energy efficiency otherwise housebuilders will continue to follow Building Regulations which only sets the minimum standard.</p> <p>It should be noted that most allocated sites will be delivered by housebuilders who operate to their own specifications designed to meet Building Regulations in terms of energy efficiency. The Council will not be able to force housebuilders to exceed these without mandating a higher specification, such as the Green Building Council's Net Zero definition which would be the 'gold standard'.</p>	Comments Noted - zero carbon element to be reviewed.
LPRPO501	Simon Linford - Czero	Chapter 13: Our homes for the future	<p>Policy OHF1 Table 13.1 shows 20 homes currently allocated in Whittington but not delivered for the plan period. Have evidence that Site W3 that they will not release their land for development</p> <p>Unclear clear how the four strategic housing allocations/areas listed in Strategic Policy OHF1 relate to the special strategy policy OSS2 and settlement hierarchy as the approach is lacking explanation. Additionally there is no reasoning which sets out the inconsistency with the current adopted spatial strategy and it is not clear how 'strategic allocations' will be made through Neighbourhood Plans, this is not the case for Whittington. Clarification is needed in relation to this by the Council. The plan should provide more support and encourage custom build and self-build residential development.</p>	Comments notes, LDC has evidence to demonstrate that site W3 is available and deliverable within plan period
LPRPO502	Mike Whiting	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>Concerned about the proposed 800 house development in Mile Oak due to the increase in traffic congestion and the dangers that would arise for pedestrians. Raises concern with regards to air quality, particularly during construction. Hopes that there will be a footpath across the new site to allow people to keep active. Understands the need for more affordable housing but doesn't see how the location can be made to work given the drawbacks.</p>	Comments noted. Policy SHA2 includes requirement for appropriate infrastructure as part of the development of the site.
LPRPO503	Peter Young (Wall Parish Council)	Whole document	<p>Green Belt land has already been released to accommodate residential development to the south of Lichfield. There is therefore a need to protect the remaining narrow Green Belt between Lichfield and Wall/Shenstone. In particular there should be no further development of the vulnerable Green Belt around Wall Island.</p>	Comments noted. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.
LPRPO504	Mr and Mrs Comfort	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>Recognise the country requires a substantial volume of new housing to cope with the current shortfall and that LDC must take its fair share of growth - however considers the location of proposed development of 800 homes in Mile Oak is wrong.</p> <p>Acts against the principle of natural justice - no explanation as to why this location was chosen, no comparison made with pros and cons of other larger service villages such as Shenstone or Little Aston. No way to challenge whether there are better locations than the one chosen.</p> <p>Acts against objective of Sustainable Communities - Strategic Objective and Priority 1 is "to grow a number of our larger service village settlements to ensure they can become consolidated sustainable communities..." Fazeley, Mile Oak and Bonehill is already unserviceably long and thin and the proposed development will make the community even longer and do nothing at all for "consolidation". These amenities struggle now from low footfall and need housing development to be within walking distance. The proposed development is within driving distance, but so, too, are the competing amenities in Tamworth and Sutton Coldfield.</p> <p>Acts against Policy OSC1 - with increased cars from the new development in Hints Road, the phasing of traffic lights will have to change bringing more stationary and slow moving traffic and declining standards of air quality.</p> <p>Acts against Key Issue 8 - reducing out commuting and Key Issue 9 - reducing the number of people using their car to travel to work.</p>	Comments noted -Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO505	Dawn Dwyer	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>Dawn Dwyer is opposed to the development at Fazeley because she believes it goes against several policies in the new local plan. She says the new development does not protect the area's heritage assets. She says that the existing levels of traffic on the A453 are already high and Fazeley will not be able to cope with an increase from the new development and goes against the climate control strategy. The reason it was originally rejected in 2009 because Mile Oak is a straight line, hasn't changed in the intervening years. Parking in Fazeley is insufficient as is, and this will exacerbate the problem. It will stretch existing hospital and education facilities. Precious green belt land will be lost and the new development will not benefit existing residents.</p>	Comments noted. Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO506	Julie Houseman	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>She is opposed to development because of the impact it would have on the volume of traffic on the area, which is already high. She also rejects to it because it is green belt land, and should be left as is. She also feels the area itself would benefit from being left alone.</p>	Comments noted. Policy SHA2 includes requirement for appropriate infrastructure as part of the development of the site.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO507	Lisa Farrington	Whole document	<p>Objects to the proposed development of any areas of Green Belt around Burntwood concerning land bordered by Hospital Road and Norton Lane.</p> <p>Green Belt only accounts for only 13% of total land in England which means that there are many other areas of land which should be developed on before Green Belt. Green Belt land plays an important role in well being and mental health.</p> <p>Area does not have the facilities to accommodate such a large influx in housing. Schools are already nearly full, doctors pushed to limits. State of roads are poor, top and bottom of Highfields Road often flooded.</p> <p>Leisure facilities regularly increase prices making the facility less accessible to everyone.</p>	<p>Comments noted. The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.</p>
LPRPO508	Shirley Harrison	Whole document	<p>Object to use of Burntwood/Hammerwich Green Bel for future development. There is a lack of infrastructure within the local area in relation to traffic, medical service provision, light pollution, crime rates etc. There will be no green spaces left for children to enjoy.</p>	<p>Comments noted. The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.</p>
LPRPO509	Alistair Russell (CALA Homes)	Policy OSS2:Our Spatial Strategy	<p>CALA Homes support the broad objectives of the Local Plan review. However, we believe that further consideration should be given to the distribution of housing, particularly within the Service Villages of the district to meet local needs. Through the adopted Local Plan Strategy and Local Plan Allocations documents, Kings Bromley was not allocated any housing. In the previous Local Plan, Kings Bromley was designated as 'other rural', meaning that it was at the lowest level of sustainability. Since the adoption of the Local Plan, Kings Bromley has become a more sustainable settlement, with the opening of a Co-op store. This is reflected in the updated settlement hierarchy (Policy OSS2).</p> <p>The spatial strategy of the plan review states that any growth within the service villages will be predominately either through rural exceptions sites, or allocations in a neighbourhood plan. Kings Bromley has recently (December 2019) been designated a neighbourhood area. However, designation of a neighbourhood area does not necessarily mean a neighbourhood plan will be produced.</p> <p>As such, Kings Bromley has not received any growth over a substantial time period. There is a local need in the area which has not been addressed through successive plans. Kings Bromley is a sustainable location for growth, with a supermarket, primary school and a regular bus service to Lichfield City Centre.</p> <p>CALA Homes believe that the Service Villages have been overlooked for moderate growth. Those sites allocated in the Preferred Options document are largely sites over 500 units, the delivery of which within expected timescales cannot be guaranteed.</p> <p>Furthermore, the sites in Whittington and Fazeley are within the Green Belt which would not seem to demonstrate exceptional circumstances. As such, a more holistic approach would be beneficial, to meet the growth outside of the major settlements, in sustainable locations and smaller sites which are more likely to deliver immediately.</p>	<p>Comments noted - Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.</p>
LPRPO510	Greg Mitchell (Framptons) on behalf of Summix BLT Developments Ltd (Browns Lane Site)	Whole document	<p>Section 4 of the Sustainability Assessment of the Po does not give any consideration to the possibility of further development north of Tamworth, despite this being acknowledged as being one of the most sustainable locations in the district.</p> <p>Consideration is given to a non-site specific new settlement proposal which may come forward at some undefined point in the future towards the end of the plan period it is considered such an approach is not reasonable or justified</p> <p>No consideration is given to the reasonable alternative that exists for further development north of Tamworth which could assist in bringing forward major positive transport benefits for the area in terms of improvement to the Gungate Corridor in Tamworth.</p> <p>Accordingly, if taken forward to submission in its present form it is considered that the Plan and SA would be found unsound.</p> <p>The transport benefits have been acknowledged by Staffs CC in their comments at the last Local Plan Examination of the site being promoted at Browns Lane.</p>	<p>Comments noted - A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed. The Council will continue to engage with infrastructure providers through the local plan review process, including SCC with regards to highways evidence.</p>
LPRPO511	Robert Barnes (Planning Prospects) on behalf of Greg Byrdie (Pall Mall 2 t/a Pall Mall Estates)	Policy OSS1: Presumption in Favour of Sustainable Development Paragraph 9.4	<p>Supports the inclusion of the policy however supporting text (paragraph 9.4) is incorrect in its assertion that, "development must accord with the policies of the development plan". Whilst the development plan is the starting point for decision taking for consistency with national policy this text should be revised to acknowledge that development must accord with the development plan "unless material considerations indicate otherwise". The Plan should be clear that whilst decision taking should be plan-led, it must also include a balancing exercise taking other material considerations into account.</p>	<p>Comments noted - will be reviewed</p>
LPRPO512	Robert Barnes (Planning Prospects) on behalf of Greg Byrdie (Pall Mall 2 t/a Pall Mall Estates)	Policy OSS2: Our Spatial Strategy	<p>Spatial Strategy is considered to be appropriate. However, two elements where it is considered the wording should be amended for clarity and to reinforce policy.</p> <p>First the policy provides, inter alia, that existing public transport infrastructure should be protected, and land for infrastructure improvements should be safeguarded. It is considered that this part of the policy could be more positively worded such that it encourages public transport infrastructure to be enhanced and encourages delivery of infrastructure improvements.</p> <p>Second, the policy states that, "Existing employment areas will be retained." For consistency with other aspects of the emerging Plan (notably Strategic Policy OEE1) this should be clarified to confirm these are the "existing employment areas" as defined on the policies map, rather than in any more general sense</p>	<p>Comments noted - wording/phrasing to be reviewed in light of comments made.</p>

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO513	Robert Barnes (Planning Prospects) on behalf of Greg Byrdie (Pall Mall 2 t/a Pall Mall Estates)	Chapter 10: Our Sustainable Communities Strategic Policy OSC5: Flood risk, sustainable drainage & water quality	The policy as drafted requires all major development proposals to incorporate sustainable drainage systems and provide details of their adoption, ongoing maintenance and management. This is inconsistent with the NPPF which provides (paragraph 165) that such systems should be provided, "unless there is clear evidence that this would be inappropriate". This wording should be reflected in the policy, together with text which supports a proportionate approach to operation and maintenance requirements.	Comments noted - currently further evidence is being collected and reviewed including a water cycle study which shape the policy further.
LPRPO514	Robert Barnes (Planning Prospects) on behalf of Greg Byrdie (Pall Mall 2 t/a Pall Mall Estates)	Policy INF1: Delivering Our Infrastructure	It is important to acknowledge, as this policy does, the importance attached to the delivery of infrastructure. The supporting text (paragraph 11.6) goes on to confirm that an Infrastructure Delivery Plan will be published to support and direct infrastructure requirements. Such a document will be crucial in the local context given the significant infrastructure costs associated with large scale development proposed such as the sustainable urban extension to Lichfield and the planned new settlement. Against this background the Council should publish its Infrastructure Delivery Plan for consultation prior to submission of the Plan and to ensure appropriate, detailed consideration around infrastructure costs and the effect on viability and deliverability.	Comments noted - IDP is currently being reviewed and worked upon. Evidence from relevant infrastructure providers is still being reviewed and relevant parties engaged with.
LPRPO515	Robert Barnes (Planning Prospects) on behalf of Greg Byrdie (Pall Mall 2 t/a Pall Mall Estates)	Chapter 14: Our Economic growth, enterprise and tourism & Policy OEET1: Our employment and economic development	The fourth paragraph of this policy, appropriately, indicates that its provisions relate to existing employment areas and allocated employment sites as defined on the policies map. For clarity and the avoidance of doubt the fifth and sixth paragraphs of the policy should be amended so they refer to "defined" employment sites and allocations, rather than in any more general sense.	Comments noted. Existing allocated employment areas are identified on the policies maps which accompanied the Preferred Options document. Current evidence suggests there are limited additional options for locating employment growth, this is explicitly referred to within the consultation document.
LPRPO516	Robert Barnes (Planning Prospects) on behalf of Greg Byrdie (Pall Mall 2 t/a Pall Mall Estates)	Chapter 14: Our Economic growth, enterprise and tourism & Policy OEET2: Our Centres	It is important that the role of Burntwood is distinguished clearly in policy from that of Lichfield. The former is intended to have a local and self-contained role, whilst the latter is intended to serve a much wider catchment. To clarify this, and for the avoidance of doubt, it is considered that the text alongside Burntwood in the Hierarchy of Centres should be amended to read, "...main weekly convenience shopping for the local population within the town." Policy OEET2 provides support for new neighbourhood centres, "which are necessary to meet the needs of planned or approved new residential and employment development." Whilst this provision is appropriate in general terms it is quite open ended and might invite the proliferation of such centres in an unplanned manner. Certain allocations within the emerging Plan (e.g. Strategic Policy SHA1) allow for the creation of a neighbourhood centre. For clarity and consistency within the Plan the wording at policy OEET2 should be extended to include, "...new residential and employment development where specified in the allocations of this Plan."	Comments noted - wording to be reviewed
LPRPO517	Robert Barnes (Planning Prospects) on behalf of Greg Byrdie (Pall Mall 2 t/a Pall Mall Estates)	Policy LC3: Lichfield services and facilities	To reinforce the provisions of this policy its wording should be amended to read, "Investment in rail services and facilities and access to those services and facilities will be encouraged...". This will help to ensure that usability and utilisation are encouraged, as well as just the services and facilities in their own right.	Comments noted
LPRPO518	Gillian Eccles	Whole document	I have been recently sent the consultation documents for the proposed housing estate in Hammerwich. This shocked me, particularly at the size of the development. There has been excessive development in the district of Lichfield and it is apparent that there is a lack of road infrastructure in the local area to cope with the existing population. Air pollution is already low in this area of Staffordshire and this housing estate could add another 2000 cars to the area is not a good idea. Education provision is also at full capacity. Brownfield sites should be utilised and developed on before green fields and the green belt are used.	Comments noted. The Preferred Options document does not propose any new homes within the Green Belt in the Hammerwich/Burntwood area. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO519	Philippa Kreuser (CT Planning) on behalf of Mr NJ Lees	Whole document	Supports the principle of a large scale housing allocations to the north east of Lichfield in Policy OHF1. Objects to the extent of the housing allocation to the north east of Lichfield shown on Inset 1. Objects to the establishment of additional Green Belt to the north east of Lichfield. Objects to the inclusion of land at Corporation Farm, Watery Lane, Curborough within the Green Belt. Preferred Options document should be amended as follows: Additional Green Belt to the north East of Lichfield shown on Inset 1 should be deleted. Failing Green Belt removal land at Corporation Farm, Watery Lane, Curborough should be removed from the Green Belt as shown on Inset 1. Land at Corporation Farm, Watery Lane, Curborough should be allocated for housing for up to 800 dwellings. Principle of allocating 3,300 homes north east of Lichfield is supported but extent of allocation is too extensive. Scale of development should be reduced by 800 homes, and 800 allocated at Corporation Farm. If the Council are to achieve its housing delivery of 536 new homes per year it needs to identify more than the 4 sites allocated at Strategic Policy OHF1 and not defer allocations to Neighbourhood Plans. One such allocation to be added to Policy OHF1 is land at Corporation Farm, Watery Lane. By reducing the allocation at north east of Lichfield reduces the risk of coalescence with Fradley. There are no very special circumstances to justify the proposed extension to the Green Belt to the north east of Lichfield. It is premature, unjustified and poorly defined. Normal development policies can safeguard Lichfield from coalescing with Fradley. Policy OEET1 identifies a need for 61 hectares of employment land within the District, it is submitted it is premature to consider additional Green Belt until the location for new employment development has been settled. Land at Corporation Farm is ideally placed to meet employment land requirements.	Comments noted. Green Belt Review 2019 makes clear that 'exceptional circumstances' would need to be demonstrated if changes to the Green Belt boundary are proposed. This has been judged to be the case in the preferred options document as stated at paragraph 16.5 in terms of meeting development needs and the identification of new Green Belt to the north of Lichfield City. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO520	Jenny Jones	Chapter SHA2: Strategic housing allocation land west of Fazeley	<p>Concerned about provision of extra housing between Mile Oak and Gainsborough Drive with the current traffic levels at mornings and tea times.</p> <p>Leaving a drive in Sutton Road at around 5pm, you have to wait around 5-10 minutes to get off the drive then there are further traffic issues at the Mile Oak traffic lights.</p> <p>Would be irresponsible to develop another 800 homes on the site, the congestion would be unbelievable.</p>	Comments noted. Policy SHA2 includes requirement for appropriate infrastructure as part of the development of the site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO521	Jennifer Cassell	Whole document	<p>Concerned about plans to build houses on Copy Nook Lane, Overton Lane, Meerash Lane and Hanney Hay Road. Increase of population makes a dramatic impact on local services such as GPs, shops and schools.</p> <p>Also a drive to decrease air pollution however public transport network for Burntwood and Hammerwich is poor with limited bus connectivity from Hanney Hay Road, encouraging residents to use their own cars. Streets already struggle with traffic capacity.</p> <p>The area has many footpaths which are used for leisure pursuits improving peoples mental health. Reduction of green space will have dramatic impact on people being encouraged to get outdoors.</p> <p>Burntwood has many locations previously used for industry that could be converted to residential use rather than the destruction of valuable Green Belt land.</p> <p>There are too many developments already in place and time should be taken to see the impact of population increase and traffic before agreement is made on anything further.</p>	Comments noted. The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO522	Pauline Rathband	Whole document	<p>Objects to land at Burntwood bordered by Coulter Lane and Fulfen Farm being released from Green Belt classification because it is environmentally and historically to the area. There is a lot of wildlife.</p> <p>Don't know where all the extra children would go to school as local schools are all full. Roads are also concerning. three of the surrounding the site are narrow winding lanes, and dangerous for a large amount of traffic.</p>	Comments noted. The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO523	Philippa Kreuser (CT Planning)	Policy OSS2 : Our spatial strategy	Object to Strategic Policy OSS2 : Specifically the inclusion of Stonnall as a Level 4 : Smaller Service Village; it is submitted that Stonnall should be included within Level 3 – Larger Service Villages given the facilities and services within the settlement Stonnall has a range of services that is equal to, if not better than, some Level 3 villages.	Comments noted - Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO524	Philippa Kreuser (CT Planning)	Policy OHF1: Housing Provision	No specific allocation within Stonnall - should be provided.	Comments noted - A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO525	Philippa Kreuser (CT Planning)	Policy ST1: Stonnall economy	<p>The threshold for supporting local services and facilities is such that additional housing is required in Stonnall to sustain the vitality and viability of local services and facilities; without new housing, existing services and facilities could wither and die</p> <p>It is submitted that Stonnall, given that it is located in such a sustainable location, the PO document should be amended to provide for a specific housing allocation to Stonnall and that Stonnall be re-designated as a Level 3 – Larger Service Village. Bus services are available along Main Street and Wallheath Lane. The site is available, suitable and achievable for housing. There are no technical constraints that would prevent the site from being brought forward for development within the next five years. The site is within 500 metres of the majority of services and facilities within the village. The proposed development would represent a logical extension to the Development Boundary of Stonnall and will provide for a balanced and sustainable development.</p> <p>The site could supply up to 50 dwellings in a location where future residents can access daily provisions, employment and a wide range of services and facilities by a choice of sustainable transport modes.</p>	Comments noted - Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed. These sites have been selected against the relevant hierarchy within the plan
LPRPO526	N Smith	Policy ONR1: Green Belt	Object to the releasing of green belt land for housing development at coulter lane Burntwood. Preferring the development to be in Burntwood town for 400 houses.	Comments noted. The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO527	Sharon Mole	Policy ONR1: Green Belt	Loss of large area of greenbelt land reducing the health benefits and recreation opportunities for local residents.	Comments noted. The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO528	Philippa Kreuser (CT Planning) on behalf of Mr P Smith	Policy OHF1: Housing Provision	Support hierarchy - Armitage is sustainable settlement with key facilities and infrastructure for growth and housing delivery.	Comments noted - Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO529	John Pearce (Harris Lamb) on behalf of Muller Property Group	Policy OSS2: Our spatial strategy	<p>Has concerns about the identification of requirement to deliver 7,282 dwellings to meet the needs of the District and a contribution of 4,500 dwellings to meet the unmet needs arising from Birmingham. The emerging Plan includes a housing requirement for Lichfield District based upon the application of the Standard Method. The Framework advises at paragraph 60 that, in order to determine the minimum number of homes required, strategic policies should be informed by a Local Housing Needs Assessment, conducted using the Standard Method in national planning guidance 'unless exceptional circumstances justify an alternative approach, which also reflects current and future demographic trends and market signals'. It is not, therefore, appropriate to automatically assume the application of the Standard Method should be used to establish the Lichfield District element of the housing requirement. Factors exist highlighted in Section 5 - Profile of the District that would indicate there are exceptional circumstances that would warrant the Council diverging from the standard method. These include evidence of an ageing population couple with house price affordability being worse than in the Greater Birmingham area. Council also confirms that over 80% of the housing needed in the District is for affordable housing. There are exceptional circumstances to warrant Council diverging from the standard method. Contend that proposed housing requirement is too low and will result in the Council not achieving its aims.</p> <p>Considers the proposal to accommodate 4,500 dwellings to contribute to Birmingham's unmet housing need is too low and has not been fully justified. The combined shortfall is 67,000 and presents a significant issue. Redditch and Tamworth have limited ability to accommodate further development due to existing constraints, while Stratford-on-Avon has a peripheral relationship and North Warwickshire are already proposing to accommodate 3,500 dwellings. Effectively, Lichfield along with Solihull, Bromsgrove, South Staffordshire and Cannock will need to accommodate over 60,000 dwellings to meet the wider needs of the conurbation. Contends that a greater quantum of unmet need should be accommodated within the District. Additional housing does not need to be met adjacent to the conurbation and that a greater range of sites across the District including those in Smaller Service Villages could contribute.</p> <p>Does not object in principle to any of the four strategic allocations in terms of their suitability for development. However, has concerns about the ability of these strategic sites to deliver new housing particularly in the early part of the Plan. This concern is highlighted by the fact that a number of allocations in the currently adopted Part 1 Local Plan are being carried forward to the new Plan, which only goes to demonstrate the inherent difficulties in bringing large strategic sites forward in a timely manner. Contends that more housing allocations should be made. Kings Bromley as a Smaller Service Village is considered suitable to accommodate more housing.</p>	<p>Comments noted - Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review.</p> <p>The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period.</p>
LPRPO530	Philippa Kreuser (CT Planning) on behalf of Mr P Smith	Policy OSS2: Our spatial strategy	Support the inclusion of Armitage in the Settlement Hierarchy as set out in Policy OSS2 : Our Spatial Strategy. Given the sustainable credentials of Armitage with Handsacre it is submitted that the settlement could support a greater number of dwellings than the 150 new dwellings proposed in Policy OHF1 : Housing Provision. It is submitted that Policy OHF1 should be amended to increase the housing allocation to the settlement	Comments noted
LPRPO531	John Pearce (Harris Lamb) on behalf of Muller Property Group	Policy OHF1: Housing Provision	<p>The strategic allocation north east of Lichfield accounts for nearly a quarter of total housing to be delivered within the District however no technical information is included in the document to confirm that it is viable or deliverable. Contends that a greater range of smaller and medium sized sites should be allocated throughout all the settlements in the top 4 tiers of the settlement hierarchy, including at Kings Bromley.</p> <p>Policy states that within the Tier 1 to 4 settlements there is a need to identify new locations adjacent to existing settlements to accommodate the balance of dwellings which cannot be built on sites within the existing urban areas of the District. Other than the four strategic allocations it is inferred that the wider development needs of the District will be met on sites within the built up areas of the other settlements. Questions whether this is a viable option considering that the current Part 1 Plan releases land from the Green Belt to meet the needs of the District. The release of land from the Green Belt would indicate that there is not sufficient urban previously developed land available; a position that is unlikely to change as the emerging Plan progresses towards adoption.</p> <p>Contends that in order to direct growth to sustainable locations included in the settlement hierarchy, the Council should actively look to make allocations. In the Smaller Service Villages, such as Kings Bromley, allocations for development would need to be located outside but adjacent to the existing development boundary if any meaningful sites are to be identified.</p>	Comments noted. The District Council has identified strategic sites within the Preferred Options document based upon a range of evidence. The site selection paper provides detail of the approach taken. Strategy enables smaller settlement to grow and for local communities through Neighbourhood Plans to identify a non-strategic level of growth.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO532	Barton Willmore - Engie (Rugeley Power Station)	Policy OSS2: Our Spatial Strategy	<p>It is noted that for the Plan period up to 2040, a minimum of 7,282 dwellings plus a contribution of 4,500 dwellings towards meeting the Greater Birmingham and Black Country Housing Market Area shortfall are to be provided (totalling a minimum of 11,800 dwellings). Whilst this positive approach to meeting local housing needs and accommodating the shortfall is welcomed these figures and the latest evidence supporting them, will need to be explained, particularly in relation to the contribution towards the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) unmet needs. It is considered that further clarity should be provided, in relation to both the housing market shortfall figure and also how the identified local housing needs and economic ambitions of the draft Local Plan align.</p> <p>Noted that the updated Urban Capacity Study (2019) forming part of the evidence base to the Local Plan assumes the former Power Station site will deliver 800 dwellings within Lichfield. However, no capacity for the wider site falling in Lichfield District is referenced within the draft Plan and the intention to carry forward the allocation and site capacity is not clear in the Local Plan policies. Unclear to what extent the RPS site is contributing to the minimum overall requirement for 11,800 dwellings up to 2040.</p> <p>PROPOSED CHANGES</p> <ol style="list-style-type: none"> 1. Rugeley to be identified as an 'Other Main Centre', 'Key Urban Settlement' or similar to ensure consistency with the Local Plan Strategy and to reflect its ability to accommodate growth in a sustainable manner. 2. Distinction to be made between the East of Rugeley allocation and the January 2020 resolution to grant for the Rugeley Power Station. 3. The settlement boundary should be updated to accommodate the proposed development at the site. 4. The Urban Capacity Study should similarly be updated 	Comments noted
LPRPO533	Barton Willmore - Engie (Rugeley Power Station)	Policy OSC1: Securing sustainable development	<p>Draft policy does not contain any specific targets, and we would highlight that on-site renewables and other technological improvements are not the only way of reducing carbon. The policy should include support for developments which are investing in infrastructure which can provide wider benefits. Policy OSC1 should allow additional weight to be afforded to proposals which can deliver sustainable development in this way. It should be ensured that any requirements related to this policy are considered as part of the Local Plan viability assessment and are not delegated to Supplementary Planning Documents going forward.</p>	Comments noted
LPRPO534	John Pearce (Harris Lamb) on behalf of Muller Property Group	Policy OHF4: Affordable housing	<p>Supports the Council's intention to support rural exception sites where affordable homes can be delivered to meet the needs of local people from within the District.</p> <p>Contends that the Council should be more ambitious in looking to bring forward rural exception sites and that these should not be necessarily restricted to 'small' sites. Medium sites of approximately 50 dwellings could make a meaningful contribution to the delivery of affordable housing. Such sites should be allocated in the Smaller and Larger Service Villages.</p> <p>Query the need to demonstrate the need for affordable housing to support a rural exception site (third bullet point) as the Council have acknowledged 80% of all need in the District is for affordable housing therefore who do the Council require further evidence.</p>	Comments noted.
LPRPO535		Policy OSC2: Renewables and Low Carbon Energy	<p>Proposed that policy to clarify that this is not an on-site requirement and that any subsequent revisions to the policy to require on-site provision are not applied to reserved matters.</p>	Comments noted.
LPRPO536	Barton Willmore - Engie (Rugeley Power Station)	Policy OSC4: High Quality Design	<p>The draft policy provides a series of key design elements to be considered, including carbon reduction and energy efficiency. Whilst the draft policy does not currently contain any specific targets. The viability of achieving any standards that may be over and above Building Regulation requirements should be taken into consideration. Policy should be clarified that the aims of sustainable development can be achieved through other means than just technology.</p>	Comments noted.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO537	Barton Willmore - Engie (Rugeley Power Station)	Policy OHF1: Housing provision	<p>Whilst the draft Plan provides sections that detail the strategy and site allocations for the settlements in the hierarchy across the District, there is no explicit reference to the proposed redevelopment of the site, or the allocation East of Rugeley, within the main body of the draft Plan. We consider there is merit in identifying the sustainability of Rugeley and the site in meeting local and wider housing needs.</p> <p>Propose the following changes:</p> <ol style="list-style-type: none"> 1. Distinction to be made between the East of Rugeley allocation and the January 2020 resolution to grant for the Rugeley Power Station. 2. Policy to identify the contribution the site will make to the overall housing requirements (expressed as a minimum). 3. Policy to identify Rugeley and the site as a focus for sustainable growth 	Comments noted.
LPRPO538	John Pearce (Harris Lamb) on behalf of Muller Property Group	Chapter 21: Smaller Service Villages Kings Bromley	<p>Agrees that Kings Bromley is a sustainable settlement that currently has a good range of services and facilities present. Furthermore, agrees that sustaining the range of facilities and services is essential. However, disagrees that the way to sustain the existing facilities is to only permit a limited amount of development within the village. Directing new housing to Kings Bromley will help to sustain the existing range of facilities and services in the village. A review of the 2019 SHLAA indicates none of the sites submitted for consideration are within the development boundary of the village. As such, any meaningful development is to be directed to Kings Bromley then it will have to be located on land that is outside but adjacent to the settlement boundary.</p> <p>Land in Muller Property Group's control was subject of an earlier planning application that was ultimately refused by the Council, however this was mainly due to the sites location outside of the development boundary and thus contrary to policy. Allocation of the site would overcome the principle objection to its development. Supporting work submitted in support of the application confirmed all technical and environmental issues could be addressed and would not pose a constraint to development.</p> <p>Contend site to the north of Alrewas Road, Kings Bromley is a suitable site to be allocated for residential development.</p>	Comments noted.
LPRPO539	Barton Willmore - Engie (Rugeley Power Station)	Policy OHF2: Providing a balanced housing market and optimising housing density	<p>The flexibility provided in this policy is welcomed, it is considered that the policy wording could be clarified further to state that where a housing mix is broadly in line with the requirements it will be considered acceptable, and only where there are 'significant' variations will further evidence be required to justify the proposals. This is important given the length of the Plan period and the need to respond to changes in the housing market. Fundamentally, the policy should recognise that it cannot be applied as a blanket approach. It needs to be applied flexibly to reflect the individual characteristics of the site.</p> <p>The housing mix policy should allow for flexible implementation, with particular reference to the importance of individual site characteristics, including previously developed sites. Encourage a diverse housing mix where it assists in delivering other key priorities such as affordable housing.</p> <p>The density policy should specifically identify Rugeley and the former Power Station site, alongside Lichfield city and Burntwood, as a sustainable location where higher densities are expected to be achieved. The density policy should identify that high-quality design can be achieved at higher densities with the use of Design Codes and other controls.</p>	Comments noted.
LPRPO540	Barton Willmore - Engie (Rugeley Power Station)	Policy OHF4: Affordable Housing	<p>It is noted that the draft policy does not yet specify the level of affordable housing that will be sought in the District, as this is subject to further viability assessment work. This work will be produced ahead of the Regulation 19 consultation of the Local Plan Review. The viability assessment should consider all the contributions expected from developments via Local Plan policies to inform its conclusions, as per national planning policy. As above, individual site characteristics should form an important consideration. Policy to recognise the importance of individual site characteristics.</p>	Comments noted.
LPRPO541	Barton Willmore - Engie (Rugeley Power Station)	Policy OEET2: Our centres	<p>Consider that the policy should identify the centre resolved to grant as part of the redevelopment of the former Rugeley Power Station site. This centre should be allocated as a smaller centre in the Council's retail hierarchy. The smaller retail centre within the Lichfield end of the site will help to serve the small-scale retail and leisure needs of the new and existing residents and should therefore be identified within the hierarchy of centres.</p> <p>The retail hierarchy should include the proposed new retail centre within the redevelopment of the former Rugeley Power Station site.</p>	Comments noted.
LPRPO542	Barton Willmore - Engie (Rugeley Power Station)	Policy OSR2: Open space and recreation	<p>Welcome that support will be given to the development of shared facilities which increase the opportunities for communities to improve their health and well-being including provision which forms part of schools and colleges. Further clarification should be sought that this can include the sharing of provision on new developments where it helps to deliver on the Council's other strategic objectives and priorities. The policy should clarify that that the provision of sports provision on new developments can be shared with schools or colleges where appropriate and where it helps to deliver on the Council's other strategic objectives and priorities</p>	Comments noted.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO543	John Pearce (Harris Lamb) on behalf of Muller Property Group	Policy KB2: Kings Bromley services and facilities	Generally support the policy. Commend the direction of further residential development to Kings Bromley as it will not only help sustain existing shops, services and facilities, but it will contribute to the delivery of new housing to meet an established local need in a sustainable rural settlement. New housing in the village will also make a contribution to meeting the wider housing needs of the District and the unmet need arising in the conurbation. Muller Property Group's site to the north of Alrewas Road is well located in relation to existing services and facilities in the village and can be developed to deliver up to 57 dwellings, thereby making an important contribution to the supply of housing. Furthermore, as a medium sized site, it is free from technical and environmental constraints and the provision of significant new infrastructure is not needed in order for to deliver new units. It can, therefore, deliver new housing in the early part of the Plan Period, making an important contribution to the five year supply of housing	Comments noted
LPRPO544	Richard Brown (CBRE) on behalf of St Modwen	Whole document	Section 2 there should be an opportunity for consultation on draft policies and the updated evidence base in advance of the Regulation 19 consultation. Welcomes paragraph 2.21, which sets out that the LPA will need to demonstrate that any cross boundary strategic issues, such as planning for employment land, will need to be set out in one or more Statements of Common Ground and demonstrate how these issues have been dealt with.	Comments noted. The plan proposed within settlements such as Armitage & Handsacre housing sites are to be identified by the neighbourhood plan or future local plan documents.
LPRPO545	Tetlow King Planning on behalf of West Midlands HARP Planning Consortium	Chapter 13: Our Homes for the Future Policy OHF2: Balanced housing market	Policy OHF2 is effective in demonstrating the mix and types of housing in demand in the District; the table provides a very clear and understandable method of relaying information to the applicant on the housing mix sought by the Council. The figures are robustly evidenced by an up to date 2019 Housing and Economic Development Needs Assessment (HEDNA). In addition, it is welcomed that the Council has incorporated an element of flexibility into the wording of Policy OHF2, allowing for the final housing mix of a scheme to be subject to negotiation. Supports the Council's decision include policy text in support of the delivery of specialist housing for older people. In order improve this policy, or as an addition to Policy OHF4 (Affordable housing), the Council should look to specify the circumstances in which they would expect specialist housing to provide affordable housing. If the Council expects developments that are classified as residential institutions (C2) to contribute to the delivery of affordable housing in the District, this should be fully justified in relation to need and viability and should provide an appropriate level of flexibility.	Comments noted - Evidence within the HEDNA suggests the Council will be justified in seeking to achieve as much affordable housing as viably possible on appropriate development sites. Further viability evidence is being collected which will inform the policy and provide a clear position in terms of the appropriate level of affordable housing to be sought.
LPRPO546	Richard Brown (CBRE) on behalf of St Modwen	Chapter 8: Our strategic objectives & priorities	Suggests changes to Objective 8 Employment Opportunities: To ensure that employment opportunities within the District are created through providing a diverse and commercially attractive portfolio of employment opportunities which promote the development of new enterprise and support the expansion and diversification of existing businesses, to deliver economic growth, investment and new employment opportunities including to meet the identified needs of local people.	Comments noted - Existing allocated employment areas are identified on the policies maps which accompanied the Preferred Options document. Current evidence suggests there are limited additional options for locating employment growth, this is explicitly referred to within the consultation document.
LPRPO547	Richard Brown (CBRE) on behalf of St Modwen	Policy OSS2:Our spatial strategy	Should clarify its support for specific employment sectors important to the District and West Midlands Local Industrial Strategy, as well as its support for providing a diverse and commercially attractive portfolio of employment land to realise the Draft Local Plan's ambitions to create high quality employment, reduce out-commuting and promote sustainable travel. Altered wording suggested.	Comments noted - proposed wording noted
LPRPO548	Richard Brown (CBRE) on behalf of St Modwen	Policy OEE1: Our employment and economic development	Should clarify which existing and new employment allocations are allocated to meet identified quantitative and qualitative employment needs over the Plan period, including retaining a flexible and pragmatic approach to employment uses (Classes B1, B2 and B8) to be delivered on identified employment sites to maximise the ability to attract investment and meet economic growth ambitions. Should be informed by further evidence base documents relating to the qualitative and quantitative site-based requirements of specific employment sectors, especially the logistics sector. The HEDNA should be revised to encompass the extended Plan period up to 2040 and the 'policy-on' growth scenario of accommodating cross boundary housing needs. The employment land requirement set out in Strategic Policy OSS2 should be revised accordingly, setting an overall strategy for the pattern, scale, quality and location of development. This evidence should inform the allocation of existing and additional new employment sites required to meet the District's and any cross-boundary employment needs.	Comments noted. No requests for the provision of employment land to meet cross boundary needs have been identified.
LPRPO549	Philippa Kreuser (CT Planning) on behalf of Essington Park Ltd	Policy OSS2:Our Spatial Strategy	Support Alrewas being identified as a Level 3 -large service village. Object to failure to identify Alrewas as a location for a new strategic housing allocation. Its stand any reasonable prospect of achieving housing target should identify more than 4 strategic sites. Shouldn't defer allocation of 536 dwellings to Neighbourhood Plans.	Comments noted - The plan proposed within settlements such as Alrewas housing sites are to be identified by the neighbourhood plan or future local plan documents.
LPRPO550	Philippa Kreuser (CT Planning) on behalf of Essington Park Ltd	Policy OHF1: Housing Provision	Amend to make specific housing allocation at Dark Lane, Alrewas for up to 20 houses.	Comments noted - The plan proposed within settlements such as Alrewas housing sites are to be identified by the neighbourhood plan or future local plan documents.
LPRPO551	Philippa Kreuser (CT Planning) on behalf of Essington Park Ltd	Policy A1: Alrewas services and facilities	Delete canal and Riverbank Local Green Space and allocate for housing with additional area for community open space as area too large for local green space and frustrates the ability to provide sufficient housing in Alrewas commensurate to status as a large service village.	Comments noted - The relevant evidence relating to this policy justifies the reasoning for the allocation green space and green infrastructure.
LPRPO552	Philippa Kreuser (CT Planning) on behalf of Mr Swain	Policy ONR1: Green Belt	Support removal of land from the Green Belt at Fossey lane, Lichfield City. Boundaries should be clarified on Inset plan.	Comments noted - mapping will be reviewed

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO553	Tetlow King Planning on behalf of West Midlands HARP Planning Consortium	Policy OHF4: Affordable housing	<p>Policy OHF4 does not refer to the most up to date definition for affordable housing, instead referring to affordable housing as 'social rent, affordable rent or intermediate tenures', as listed in the NPPF 2012. We also note that the definition for affordable housing listed within the Preferred Options document glossary is also out of date.</p> <p>The Government published the revised NPPF in February 2019 which included a new definition of affordable housing at Annex 2. The new definition provides a number of new categories aimed at widening the scope of the definition to include a wider array of tenures to assist people into homes that meet their needs. Affordable tenures now include affordable housing for rent, starter homes, discounted market sales housing and other routes to home ownership including shared ownership, relevant equity loans, low cost homes for sale and rent to buy products.</p> <p>Strongly recommend the Council update Policy OHF4 to include the most up to date definition of affordable housing or simply state the policy should be read in line with the current NPPF definition for affordable housing. Whilst small amendments are need to the Preferred Options document, it appears the HEDNA (2019) has taken account of the new definition and does not therefore require an update.</p> <p>While the evidence indicates that there is a need for 80% of the District's housing need to be affordable, this is clearly not a viable or realistic option for providers. The Council should look to set an ambitious target for affordable housing in order to maximise the delivery of affordable housing, nevertheless, this figure must be robustly shown to be viable across a variety of development scenarios. Supports the suggestion made by the 2019 HEDNA with regard to thresholds; to follow the current policy basis of 40% on qualifying sites in Lichfield as a starting point and increase this figure where viable.</p>	<p>Comments noted Evidence within the HEDNA suggests the Council will be justified in seeking to achieve as much affordable housing as viably possible on appropriate development sites. Further viability evidence is being collected which will inform the policy and provide a clear position in terms of the appropriate level of affordable housing to be sought.</p>
LPRPO554	Tetlow King Planning on behalf of West Midlands HARP Planning Consortium	Whole document	<p>The introduction of entry-level exception sites in the NPPF has been widely welcomed as an addition to the opportunities Housing Associations have to meet housing needs in areas that may not otherwise have been considered suitable for general housing proposals.</p> <p>Encourages the council to introduce a locally specific policy on entry-level exception sites that enables delivery of affordable housing-led schemes that are aimed at first-time buyers/renters and seek to allocate land specifically for these sites to encourage further delivery. It is important to note that unlike the policy on rural exception sites, the NPPF does not seek to secure affordable housing delivered on entry-level exception sites in perpetuity so it would be inappropriate to require this in a local policy.</p> <p>Notes that the Local Plan Review is silent on the use of Vacant Building Credit (VBC) within the Authority. As the use and impact of VBC varies greatly, we are of the view that if the Council were minded not to allow VBC, it should be appropriately justified within the Local Plan.</p>	<p>Comments noted - will review VBC</p>
LPRPO555	Philippa Kreuser (CT Planning) on behalf of KB Jackson and Sons (Properties) Ltd	Policy OHF1: Housing provision	<p>Objects to the specific housing allocation for Burntwood and objects to the inclusion of Land at Wharf Lane, Burntwood within the Green Belt. It is startling that there is no Strategic Housing Allocation for Burntwood in Policy OHF1 when it is identified as a Level 2 - Other Main Centre in the Settlement Hierarchy and at Paragraph 19.1 states that Burntwood is to be 'the second largest settlement within Lichfield District and is home to around 30,000 people' and when Strategic Allocations have been proposed for settlements (Fazeley and Whittington) that are a fraction of the size of Burntwood. No explanation as to why there is no Strategic Housing Allocation for Burntwood, furthermore, deferring the allocation of 400 dwellings to Burntwood Neighbourhood Plan is fraught with risk given there is still no neighbourhood plan.</p> <p>If the District Council is to stand any realistic prospect of meeting its housing delivery of 536 dwellings, then it should increase the number of Strategic Allocations at Policy OHF1 and not defer allocations to Neighbourhood Plans.</p> <p>It is submitted that Policy OHF1 should be amended to make Strategic Allocations for Burntwood. One such allocation to be added to Strategic Policy OHF1 is Land South of Highfields Road, Burntwood and allocated for 400 dwellings. Site is available, suitable and achievable for housing. No technical constraints that would prevent the site from being brought forward for development within the next five years. Can deliver a range of house types in terms of their size, type and tenure, including affordable housing. Affordable housing will not be delivered in Burntwood unless a strategic housing allocation is made for Burntwood.</p> <p>It is submitted that the Green Belt Boundary around Burntwood is too tightly drawn to endure; it makes no provision for the future development of Burntwood in this plan period and beyond. The Area of Development Restraint north of Coulter Lane, Burntwood is evidently too small to meet the development requirements of the second largest settlement in Lichfield District in this plan period, yet alone in future plan periods. Submitted that the Green Belt Boundary surrounding Burntwood be amended to exclude Land at Wharf Lane; this site adjoins the defined Development Boundary for Burntwood and is evidently well located to meet its development requirement now and in the future. If it is not allocated then it should be re-allocated as an Area of Development Restraint to meet the future development requirements of Burntwood.</p>	<p>Comments noted - The document identifies areas of 'Safeguarded Land' as defined within national policy. National policy states that consideration should be given that where changes to the Green Belt boundary are being proposed then areas of land between the urban area and the Green Belt (Safeguarded Land) should be identified to ensure the Green Belt boundary is capable of enduring beyond the plan period. The preferred options document identifies areas of such safeguarded land in conformity with national planning policy. The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.</p>

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO556	K Else (Claremont Planning) on behalf of Harworth Group	Whole document	Support the vision in particular delivering housing and employment growth, recommend recognition given to the need to enhance Burntwood as is the second largest settlement and is a sustainable location to accommodate development. Proposed level of growth is insufficient and should be increased to ensure sufficient affordable housing need is met. Object to omission of Burntwood as one of the locations for strategic allocation given its position in the settlement hierarchy and its sustainability credentials. Current approach is not the most sustainable, consideration should be given to further Green Belt release on the edge of Burntwood.	Comments noted - The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents rather than through a strategic allocation. Green Belt Review 2019 makes clear that 'exceptional circumstances' would need to be demonstrated if changes to the Green Belt boundary are proposed. This has been judged to be the case in the preferred options document
LPRPO557	K Else (Claremont Planning) on behalf of Harworth Group	Chapter 6: Issues	Support especially issues 1-3, which are key to delivering a sustainable future. Requires District to ensure sufficient sites are allocated. Para 6.3 Support the issues identified at Burntwood. Given the environmental constraints identified at Burntwood it is considered growth should be directed to the south east of the town as this is least constrained.	Comments noted
LPRPO558	Joanne Seal	Policy ONR1: Green Belt	Concern regarding removal of Green Belt status at Coulter Lane. Burntwood has seen significant expansion and not sufficient infrastructure. There is a lack of open space, traffic congestion, lack of medical and education provision locally.	Comments noted. - The document identifies areas of 'Safeguarded Land' as defined within national policy. National policy states that consideration should be given that where changes to the Green Belt boundary are being proposed then areas of land between the urban area and the Green Belt (Safeguarded Land) should be identified to ensure the Green Belt boundary is capable of enduring beyond the plan period. The preferred options document identifies areas of such safeguarded land in conformity with national planning policy.
LPRPO559	Philippa Kreuser (CT Planning) on behalf of Elford Homes (Nick Misselke)	Whole document	<p>Supports the identification of Whittington as a Level 3 Larger Service Village in the settlement hierarchy set out in Policy OSS2 as Whittington is a most sustainable location for new development. Supports the identification of Whittington as location for new development. Supports the identification of Whittington as a location for new housing allocation as set out in Policy OSS2.</p> <p>It is submitted given the sustainable credentials of the village and its Level 3 settlement status, that Whittington could accommodate a greater number of houses than the 75 dwellings proposed in Policy OHF1: Housing Provision. Emerging plan sets out considerably more dwellings to be provided for in other Green Belt Level 3 Settlements such as Armitage with Handsacre, Shenstone and Fazeley. Policy OHF1 should therefore be amended to increase the housing provision to Whittington consistent with its related key settlements that are deemed to be providing a similar service to their communities in the District.</p> <p>Objects to Policy SHA4: Strategic Housing Allocation for Land off Huddlesford Lane, Whittington. Submitted that any housing allocation to the village would be more appropriately dispersed around the settlement.</p> <p>A site suitable and available to be allocated as a housing site on the edge of the village is Land at Church Farm, Back Lane, Whittington (SHLAA ref: 273). Comprises 2.2ha and could deliver 41 dwellings. This site along with Land to the East of Common Lane, Whittington (SHLAA ref 226) which could deliver 27 dwellings, could, if both were allocated, deliver the proposed strategic requirement of 75 dwellings to Whittington but with less environmental impact to the village.</p> <p>Land at Church Farm, Back Lane can be delivered as either a strategic or non-strategic housing site through an Allocations document or Whittington and Fisherwick Neighbourhood Plan. Site is of a sufficient size that a policy compliant mixture of housing could be brought forward in terms of size, type, design and tenure. Residential development in this location would represent a logical rounding off of the existing settlement which would be less intrusive into the Green Belt/ countryside than the proposed strategic allocation at Land at Huddlesford Lane.</p>	Comments noted - Green Belt Review 2019 makes clear that 'exceptional circumstances' would need to be demonstrated if changes to the Green Belt boundary are proposed. This has been judged to be the case in the preferred options document Policy SHA4 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO560	James Beynon (Quod) on behalf of Evans Property Group	Whole document	<p>The Council have previously considered the Site to be developable for residential development within their Strategic Housing Land Availability Assessment (SHLAA) (2016, 2017 & 2018), as part of a larger site (ref. '838'). Only part of site '838' has been carried forward within the Council's more recent SHLAA (July 2019), being renamed as site reference '250'. This does not include the Site despite it being available, suitable and deliverable for residential development, and representing a more logical extension to the defined Settlement Boundary.</p> <p>Without consideration of the Site as part of the Sustainability Appraisal (SA) process, the Draft Plan cannot be justified or consistent with national policy. It cannot, therefore, be "sound" in its current form.</p> <p>The Draft Plan is underpinned by an updated SHLAA (July 2019). This modifies site reference '838' (now referenced as site '250') and removes the Site (see Figure 2.1 below). This is despite Quod submitting representations to the previous consultation on the Draft Plan in March 2019, confirming that the Site was available, suitable and deliverable for residential development. As a consequence, the Site has not formed part of the Council's SA process, and the Draft Plan is not based on an appropriate assessment of alternatives.</p> <p>There is a clear acceptance that established Settlement Boundaries must be extended in order to accommodate the Council's housing need, including within Fradley. These representations go on to outline the Site's sustainability merits against the Council's SA assessment criteria, and confirm that it is suitable, available and achievable for sustainable residential development within the plan period. More so, it is a more sustainable location than draft allocation SHA3.</p>	Comments noted. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO561	K Else (Claremont Planning) on behalf of Harworth Group	Chapter 7: Our Vision	Should release further Green Belt at Burntwood adjacent to sustainable settlements such as Burntwood. Land at Hospital Road offers an excellent location and should come forward ahead of site identified in the villages given the sustainability credentials for the town.	Comments noted. - The document identifies areas of 'Safeguarded Land' as defined within national policy. National policy states that consideration should be given that where changes to the Green Belt boundary are being proposed then areas of land between the urban area and the Green Belt (Safeguarded Land) should be identified to ensure the Green Belt boundary is capable of enduring beyond the plan period. The preferred options document identifies areas of such safeguarded land in conformity with national planning policy. The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO562	K Else (Claremont Planning) on behalf of Harworth Group	Chapter 8: Our Strategic Objectives and Priorities	Support strategic objective and priority 6 and 12	Comments noted.
LPRPO563	K Else (Claremont Planning) on behalf of Harworth Group	Chapter 19: Burntwood	Object as a higher level of housing should be allocated at Burntwood as it is a second tier settlement. Object to leaving allocations to the Neighbourhood Plan.	Comments noted.
LPRPO564	K Else (Claremont Planning) on behalf of Harworth Group	Policy NS1: New settlement	Object as no certainty in respect of location, timing and delivery. Should further explore removing Green Belt land at Hospital Road, Burntwood.	Comments noted.
LPRPO565	K Else (Claremont Planning) on behalf of Harworth Group	Policy OHF1: Housing Provision	Object. Insufficient houses being built to meet the needs of the GBBCHMA. Council is justified in increasing overall housing delivery to ensure the affordable housing need is met. Land to the north east of Lichfield for 3,300 dwellings, given any lack of evidence in the public domain as to its deliverability and viability, particularly given the large scale infrastructure improvements that will be required to deliver this site, land at the north east of Lichfield is proposed between existing sites at Streethay and Watery Lane and concentrating housing in this part of the District is not the most sustainable option and will impact on market saturation and housing delivery. It is considered that a more coherent distribution is considered appropriate. Objection raised to the omission of Burntwood as a location for strategic development given its place in the settlement hierarchy and sustainability credentials. Site at Hospital Road offers excellent opportunity.	Comments noted - Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review. The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period.
LPRPO566	K Else (Claremont Planning) on behalf of Harworth Group	Policy OHF4: Affordable housing	Objects to lack of target within the policy. It is considered that if 35% is deemed viable then this should be specifically set out within the policy wording. Without this certainty the deliverability of affordable homes is under jeopardy as there is little certainty that it will come forward.	Comments noted. - Evidence within the HEDNA suggests the Council will be justified in seeking to achieve as much affordable housing as viably possible on appropriate development sites. Further viability evidence is being collected which will inform the policy and provide a clear position in terms of the appropriate level of affordable housing to be sought.
LPRPO567	K Else (Claremont Planning) on behalf of Harworth Group	Policy OSS2: Our spatial strategy	Objection raised to the overall proposed level of housing. Objection raised to the omission of Burntwood as one of the locations for strategic allocation. There is aspiration for improvement to the local services in Burntwood, an allocation at Hospital Road would boost patronage of local services and the provision of new services on site would compliment the local and district aspirations. Further consideration should be given to Green Belt release on the edge of sustainable settlements such as Burntwood.	Comments noted.
LPRPO568	K Else (Claremont Planning) on behalf of Harworth Group	Policy SHA2: Strategic housing allocation land west of Fazeley	Consider site will intrude into open countryside, concern at highway conditions, site is somewhat divorced from local facilities and amenities. More sustainable sites exist such as Hospital road Burntwood.	Comments noted. - The Green Belt Review provides a comprehensive strategic assessment of all parts of the green belt. Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO569	K Else (Claremont Planning) on behalf of Harworth Group	Policy ONR1: Green Belt	Welcomes recognition that changes to the Green Belt are necessary, proposals have not gone far enough. Object to omission of the amendment to the Green Belt boundary at Hospital Road, Burntwood. Site is unconstrained and has the ability to provide primary school/local amenities. Object to Coulter Lane as will lead to coalescence between St Matthews and Burntwood and Hospital Road is further from the AONB and SAC.	Comments noted - The Green Belt Review 2019 makes clear that 'exceptional circumstances' would need to be demonstrated if changes to the Green Belt boundary are proposed. This has been judged to be the case in the preferred options document The document identifies areas of 'Safeguarded Land' as defined within national policy. National policy states that consideration should be given that where changes to the Green Belt boundary are being proposed then areas of land between the urban area and the Green Belt (Safeguarded Land) should be identified to ensure the Green Belt boundary is capable of enduring beyond the plan period. The preferred options document identifies areas of such safeguarded land in conformity with national planning policy.
LPRPO570	K Else (Claremont Planning) on behalf of Harworth Group	Chapter 13: Our homes for the future	Insufficient sites being allocated at Burntwood, other smaller settlements have larger allocations, this does not provide a balanced approach. Not appropriate to leave allocations to neighbourhood plan, sites such as Hospital Road can provide strategic housing requirements and should be allocated in the LPR.	Comments noted.
LPRPO571	S Gill (Avison Young) on behalf of Grasscroft	Whole document	Strongly object to site at Hay End Lane not being allocated.	Comments noted
LPRPO572	S Gill (Avison Young) on behalf of Grasscroft	Whole document	Strongly object to SHLAA as the site is capable of coming forward in the short term. Strongly object to site selection paper as site can be delivered in 5 years and should be given a green score not an amber one.	Comments noted - A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO573	S Gill (Avison Young) on behalf of Grasscroft	Policy OHF1: Housing provision	Support level of growth, request additional evidence that sets out how the additional housing provision was considered as acceptable.	<p>Comments noted - Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review.</p> <p>The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period.</p>
LPRPO574	Josh Plant (Gladman)	Policy OSS2: Our spatial strategy	<p>Gladman supports the use of the standard method as the starting point for establishing the minimum housing delivery for Lichfield District and the intention to contribute towards the wider unmet needs of the Greater Birmingham and Black Country HMA. However, it is essential that the minimum housing requirement is clearly evidenced to ensure that effective local plans can be put in place across the area. Gladman wish to highlight to the Council that the addition of unmet need to a district's housing requirement from neighbouring authorities should be set out in a Statement of Common Ground9 and that this will need to be clearly presented in the Local Plan evidence base. Currently, no reference is made in the Preferred Options document.</p> <p>The local approach to determining the settlement hierarchy no longer recognises the role of neighbouring towns and settlements, such as Tamworth, in the consideration of the sustainability of adjacent areas that fall within Lichfield District. Tamworth offers a wide range of facilities and services, including passenger rail connectivity and therefore areas within Lichfield District that closely relate to Tamworth represent sustainable locations for growth over the plan period. This position should be fully reflected within the Local Plan's settlement hierarchy and spatial strategy for growth. In this regard, Gladman would highlight the significant opportunity to plan for sustainable development during the plan period at Wigginton Lane, Tamworth.</p>	<p>Comments noted - Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review.</p> <p>The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period.</p>
LPRPO575	S Gill (Avison Young) on behalf of Grasscroft	Policy OSS2: Our spatial strategy	Supports the inclusion of an additional 4,500 units to contribute towards addressing the shortfall of housing identified in the GBBCHMA, but may comment further on the numbers when the evidence is produced. Broadly supports the inclusion of the strategic allocations to help deliver the level of housing required to meet LDC's housing need and the additional need from the wider GBHMA. In terms of the strategic allocations, not all the units distributed under the strategic allocations may be delivered as the infrastructure requirements have not been established. Grasscroft acknowledge that larger sites are required to meet the Councils housing requirements, however small and medium can also make a strong contribution, sites such Hay End Lane, as these can be developed out fairly quickly and have less infrastructure requirements, meaning they will contribute strongly to the Councils housing land supply in the first years of the plan. Strongly support the site's inclusion within draft Strategic Allocation at Fradley (SHA3) or the standalone allocation. Strongly objects as the plan is currently not supported by a trajectory for delivery of houses on the larger strategic allocations; and the plan does not include the site at Hay End Lane as an allocation.	Comments noted.
LPRPO576	S Gill (Avison Young) on behalf of Grasscroft	Policy OSS1: Presumption in favour of sustainable development	Do not object in principle, would not support if it threatened viability and/or deliverability of development.	Comments noted.
LPRPO577	S Gill (Avison Young) on behalf of Grasscroft	Policy OSC1: Securing sustainable development	Do not object in principle, would not support if it threatened viability and/or deliverability of development.	Comments noted.
LPRPO578	S Gill (Avison Young) on behalf of Grasscroft	Policy OSC4: High Quality Design	Do not object in principle, would not support if it threatened viability and/or deliverability of development.	Comments noted.
LPRPO579	S Gill (Avison Young) on behalf of Grasscroft	Chapter 12: Our sustainable transport	OST 2 Sustainable travel and LPSOT Parking provision. Do not object in principle, would not support if it threatened viability and/or deliverability of development.	Comments noted.
LPRPO580	S Gill (Avison Young) on behalf of Grasscroft	Chapter OSR2: Open space and recreation	Do not object in principle, would not support if it threatened viability and/or deliverability of development.	Comments noted.
LPRPO581	S Gill (Avison Young) on behalf of Grasscroft	Chapter ONR3: Habitats and Biodiversity	Do not object in principle, would not support if it threatened viability and/or deliverability of development.	Comments noted.
LPRPO582	S Gill (Avison Young) on behalf of Grasscroft	Chapter ONR4: Green infrastructure and connectivity	Do not object in principle, would not support if it threatened viability and/or deliverability of development.	Comments noted.
LPRPO583	S Gill (Avison Young) on behalf of Grasscroft	Chapter 10: Our sustainable communities	Policy OSC5 Do not object in principle, would not support if it threatened viability and/or deliverability of development.	Comments noted.
LPRPO584	S Gill (Avison Young) on behalf of Grasscroft	Chapter 12: Our sustainable transport	Policy OST1 General support. It will not be appropriate for all sites so amended wording suggested.	Comments noted- not relating to wording to be reviewed.
LPRPO585	S Gill (Avison Young) on behalf of Grasscroft	Chapter 13: Our homes for the future	<p>OHF2 General support. The housing mix should reflect the findings of the evidence base and Grasscroft would suggest the following amendment, so that the mix reflects the evidence base:</p> <p>1 bed (affordable Rented) from 25% - 30% to 20%- 30%</p> <p>2 bed (affordable Ownership) from 35% - 45% to 40% to 45%</p> <p>Grasscroft would not support a policy requirement if this threatened the viability and/or deliverability of the site.</p>	Comments noted - Evidence within the HEDNA suggests the Council will be justified in seeking to achieve as much affordable housing as viably possible on appropriate development sites. Further viability evidence is being collected which will inform the policy and provide a clear position in terms of the appropriate level of affordable housing to be sought.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO586	Josh Plant (Gladman)	Policy OSS2:Our Spatial Strategy	Gladman supports the use of the standard method as the starting point for establishing the minimum housing delivery for Lichfield District and the intention to contribute towards the wider unmet needs of the Greater Birmingham and Black Country HMA. However, as set out previously, it is essential that the minimum housing requirement is clearly evidenced to ensure that effective local plans can be put in place across the area. Gladman wish to highlight to the Council that the addition of unmet need to a district's housing requirement from neighbouring authorities should be set out in a Statement of Common Ground and that this will need to be clearly presented in the Local Plan evidence base. Currently, no reference is made in the Preferred Options document, nor does the evidence base clearly contain a document which discusses how the figure of 4,500 dwellings has been prescribed and agreed by relevant parties. Furthermore, Gladman suggest the wording of the policy and minimum number of homes to be delivered will need to align with Strategic Policy OHF1.	Comments noted - Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review. The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period.
LPRPO587	S Gill (Avison Young) on behalf of Grasscroft	Policy OHF4: Affordable Housing	General support. Would not support a policy requirement if this threatened the viability and/or deliverability of the site. Amended wording suggested.	Comments noted - Evidence within the HEDNA suggests the Council will be justified in seeking to achieve as much affordable housing as viably possible on appropriate development sites. Further viability evidence is being collected which will inform the policy and provide a clear position in terms of the appropriate level of affordable housing to be sought.
LPRPO588	Josh Plant (Gladman)	Policy NS1: New settlement	Policy NS1 introduces the Council's support for the concept of a new settlement within the boundaries of Lichfield at the end of the Plan period in 2040. Currently, the Local Plan does not identify the location of any such proposal and does not anticipate that it will contribute towards the delivery of new homes within the proposed plan period. It is Gladman's submission that a sustainable opportunity exists to allocate land for larger scale development through this Local Plan through the allocation of an extension to the north of Tamworth at Wigginton Lane and that this has the ability to make a significant contribution as part of a sustainable strategy for meeting the housing needs of the area in a manner that is consistent with Paragraph 72 of the NPPF.	Comments noted. - Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed. A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed, which may see further development of policy NS1.
LPRPO589	S Gill (Avison Young) on behalf of Grasscroft	Policy ONR3: Cannock Chase SAC and River Mease SAC	Do not object in principle, reserves right to comment on a reviewed policy, would not support if it threatened viability and/or deliverability of development.	Comments noted.
LPRPO590	Josh Plant (Gladman)	Policy OHF1: Housing Provision	Notes the proposed minimum housing growth figure of 7,282 and the 4,500 contribution towards the unmet needs of the HMA. Policy OHF1 refers to the need to plan for a minimum of 11,800 dwellings between 2018 and 2040. As raised in response to Strategic Policy OSS2 above, it is important that the minimum requirement is consistently expressed in that way within the policies of the Plan. As currently drafted, Policy OHF1 states that housing delivery will be focused on sustainably located brownfield sites. However, the NPPF does not prioritise the use of brownfield land before greenfield sites for housing development and it would therefore be inappropriate for the Local Plan to do so. Gladman wish to raise a concern with the proposed approach to guide growth through a spatial strategy and settlement hierarchy that disregards the sustainability of locations that are well served by services and facilities provided within locations in neighbouring districts, such as Tamworth.	Comments noted. - Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review. The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period.
LPRPO591	S Gill (Avison Young) on behalf of Grasscroft	Policy FR1: Fradley environment	General support, suggests revision to text.	Comments noted.
LPRPO592	S Gill (Avison Young) on behalf of Grasscroft	Policy FR2: Fradley services and facilities	General support, suggests revision to text.	Comments noted.
LPRPO593	S Gill (Avison Young) on behalf of Grasscroft	Policy SHA3: Strategic housing allocation land north and south of Hay End Lane, Fradley	Broadly supports allocation. Should include a mix of sites such as this additional site at Hay End Lane. The site at Hay End Lane is available, suitable and achievable in accordance with the NPPF and also considered to be sustainable. Therefore, Grasscroft would strongly support a standalone allocation for the site or the site's inclusion within draft Strategic Allocation at Fradley (SHA3). Supports the principle of sustainable growth within the settlement of Fradley and the provision of new homes adjacent to the existing settlement.	Comments noted. - Policy SHA3 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO594	Josh Plant (Gladman)	Policy OHF2: Providing a balanced housing market and optimising housing density	Broadly supports the suggested approach of Policy OHF2 which is underpinned by the Housing and Economic Needs Assessment for Lichfield and Tamworth, published in September 2019, in providing a relevant mix of housing for new residential development and in promoting the delivery of specialist housing for older persons. It is important that policies of this nature provide flexibility to respond to changing needs and ensure that the individual characteristics of sites are taken into consideration on a case by case basis in agreeing the optimum housing mix as well as density	Comments noted. - Evidence within the HEDNA suggests the Council will be justified in seeking to achieve as much affordable housing as viably possible on appropriate development sites. Further viability evidence is being collected which will inform the policy and provide a clear position in terms of the appropriate level of affordable housing to be sought.
LPRPO595	Josh Plant (Gladman)	Policy OH4: Affordable Housing	As currently drafted, Policy OHF4 does not provide clear guidance on the required level of affordable housing. This will need to be addressed in the preparation of the final version of the policy to ensure that it is in accordance with paragraph 16(d) of the NPPF in terms of being clearly written and unambiguous, so that it is evident how a decision maker should react to development proposals. In this regard, it is welcomed that Council has committed to undertaking further viability testing with a view to establishing a policy target for affordable housing. It is important that any such testing fully considers all of the costs associated with meeting the policy requirements of the emerging plan in establishing the level of affordable housing that can be viably delivered on sites throughout the District. Gladman welcomes the intention set out in the draft policy to take a flexible approach towards ensuring scheme viability.	Comments noted. - Evidence within the HEDNA suggests the Council will be justified in seeking to achieve as much affordable housing as viably possible on appropriate development sites. Further viability evidence is being collected which will inform the policy and provide a clear position in terms of the appropriate level of affordable housing to be sought.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO596	P Rawle for Greenlight Developments Ltd	OSS2:Our Spatial Strategy	HEDNA needs to be updated to reflect the plan period. Supports approach to assessing its minimum LHN. Welcomes commitment to addressing part of GBBCHMA unmet needs. However, the Council has not taken an evidence-based approach to identifying the appropriate level of unmet housing need, with no clear explanation of the process provided to demonstrate that 4,500 homes are justified. The existing evidence base has not resulted in an agreed spatial distribution of strategic needs and without this there is a risk the regions housing needs may not be fully met. Lichfield's' functional housing market relationship analysis indicates that the Council should be seeking to make provision for c.9% of the total unmet needs of the GBBCHMA, this would equate to c.5,500 dwellings above the District's own housing needs this should be tested through the Sustainability Appraisal [SA] process. Proposed contribution to the GBBCHMA's unmet housing need is insufficient and that the Council should re-evaluate its unspecified approach to deriving an appropriate contribution to the GBBCHMA unmet housing needs, and provide sufficient and robust evidence to underpin this. Methodology provided.	Comments noted. HEDNA addendum extending to the 2040 plan period is being prepared. Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review. The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period.
LPRPO597	Josh Plant (Gladman)	Chapter 14: Our economic growth, enterprise & tourism	It is vital that the Local Plan contains policies that positively and proactively encourage the scale of development that is required to support sustainable economic growth. A clear economic vision and strategy should be put in place. This should reflect local business needs and be responsive to any wider opportunities that will allow the area to build on its strengths, counter any weaknesses and address future challenges. The policies of the local plan should match the economic strategy for the area and include policies that encourage the local and inward investment that is required to meet anticipated needs over the plan period. National policy indicates that significant weight should be placed on the need to support economic growth and productivity through the planning system. This should therefore be reflected within the drafting of local policies and it is essential that any policies provide sufficient flexibility to support proposals for economic development where they make a demonstrable contribution towards the sustainable development of the area.	Comments noted. In terms of employment current evidence suggests there are limited additional options for locating employment growth, this is explicitly referred to within the consultation document.
LPRPO598	P Rawle for Greenlight Developments Ltd	Policy OHF1: Housing provision	Suggests further land should be identified. Existing site for employment would lead to site specific environmental problems so site land south of Fradley south for 115 dwellings should be allocated for housing.	Comments noted. - Site in question considered sound for employment allocation at last EIP. Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO599	P Rawle for Greenlight Developments Ltd	Policy OEET1: Our employment and economic development	RE land south of Fradley south, as site can only be accessed via a housing site, this existing employment allocation should be reallocated for housing. Suggests revised wording or that existing policy EMP1 is carried forward in its entirety and replaces OEET1.	Comments noted.
LPRPO600	Josh Plant (Gladman)	Policy ONR1: Green Belt	Do not object to the principle of releasing land from the Green Belt or safeguarding land within the Green Belt where this can be robustly justified, this should only be considered through plan-making as a last resort where exceptional circumstances exist. Gladman consider that there are clear opportunities to channel further development to meet the housing needs of the district towards highly sustainable locations outside of the outer Green Belt boundary within Lichfield District. This includes land to the north of Tamworth at Wigginton Lane.	Comments noted. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.
LPRPO601	Hints and Canwell Parish Council	Policy OSS2:Our Spatial Strategy	Agrees growth should be targeted towards the most sustainable locations. Development at Fazeley could impact upon communities within Hints and Canwell Parish and would like to be involved in master planning and infrastructure planning. Would not support any Green Belt release in Hints and Canwell Parish.	Comments noted. Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO602	J Graham (Savills) for Barratt West Midlands	Policy OHF4: Affordable Housing	Do not support affordable housing on each residential site to the highest level viably possible. This is not consistent with the NPPF which states that affordable housing should not be sought on residential developments that are not major developments. Therefore, the Council should set out a threshold where affordable housing will be sought. Request affordable housing requirements should be expressed as a single figure rather than a range to provide certainty and clarity.	Evidence within the HEDNA suggests the Council will be justified in seeking to achieve as much affordable housing as viably possible on appropriate development sites. Further viability evidence is being collected which will inform the policy and provide a clear position in terms of the appropriate level of affordable housing to be sought.

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LPRPO603	J Graham (Savills) for Barratt West Midlands	Policy ONR1: Green Belt	Consider that the allocation of 'Land at Coulter Lane' as an ADR accords with the Council's Local Plan Strategy as it is adjacent to the second most sustainable settlement in the District, the land is not open countryside as it is between two residential areas and additional planting can be delivered along the existing brook and hedgerow to create a more robust permanent boundary. Support the removal of this land from the Green Belt. It is assessed as being 'moderately performing' within both the Green Belt Review from 2013 (Parcel E1) and the September 2019 Review (Parcel B2) is also the lowest performing Green Belt parcel adjacent to Burntwood. Land between Rugeley Road and Coulter Lane is well served by public transport and our client's site is within 400m of bus stops which offer frequent services to Lichfield, Cannock and Walsall. The release of this land from the Green Belt and its development for housing will improve the sustainability of St Matthews and accessibility from the estate to the shops and services provided within Burntwood. Work with site 172 to deliver comprehensive development. Exceptional circumstances exist to justify the release of Green Belt land. Do not support that Parcels B3 and B5 have been assessed the same as Parcel B2 under Purpose 3 as they are higher performing. Consider there are not enough sites within Burntwood's urban area to meet the Local Plan Review's requirement of 400 dwellings so should release ADR land early. Suggest amended wording to enable early release if the Council is expected to provide more than 4,500 dwellings towards the HMA shortfall.	Comments noted. Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review. The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period.
LPRPO604	J Graham (Savills) for Barratt West Midlands	Policy OSS2:Our spatial strategy	Support commitment to provide dwellings to assist in addressing the HMA shortfall. Distribution not formally agreed between HMA authorities so methodology behind this figure needs setting out. Suggest trigger mechanism which releases ADR land if LDC expected to provide more than 4,500. Support the release of the land from the Green Belt and its identification for a suitable location for growth. Additional growth should be directed to Burnt wood as the second most sustainable settlement. As new settlements and major urban extensions take significant time to deliver additional medium - large sites such as clients site should be identified.	Comments noted. Comments noted. Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review. The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period.
LPRPO605	J Graham (Savills) for Barratt West Midlands	Whole document	SHLAA Assessment shows site 130 as developable, the site could be delivered in 0-5 years and the areas of the site in Flood zone 2 and 3 and risk of surface water flooding will not impact upon the sites potential to be developed for housing. Housing Site Selection paper Site is shown as red for flood risk, however site 157 Bleak House has similar risk of surface water flooding and is shown as green? More clarity is sought.	Comments noted.
LPRPO606	J Graham (Savills) for Barratt West Midlands	Policy OHF1: Housing provision	Concerned re: No buffer has been applied. Proposed housing figure is too low and further dwellings should be directed to the most sustainable settlements such as Burntwood. Do not consider that the Council has sufficiently justified its proposed approach to direct growth away from Burntwood to less sustainable settlements in the District and not dispersing growth across the two most sustainable settlements and could therefore be contrary to Para 35 of NPPF. Table 13.1. Does not meet the minimum housing need figure in the policy. Additional housing required to be identified during this plan period should be directed to the Burntwood as the second more sustainable settlement with one of the lowest housing requirement. The proposed ADR land should be allocated in this plan period. Coulter Lane is a sustainable location and is our Clients site (SHLAA 130). Do not support allocating sites through a neighbourhood plan as Town Council are not supportive of this approach.	Comments noted. Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review.
LPRPO607	J Graham (Savills) for Barratt West Midlands	Chapter 13: Our homes for the future	Policy OHF2. Final mix on a site and density should be decided on a site by site basis taking into account market conditions and site location. Alternate wording suggested.	Comments noted.
LPRPO608	G Allen (CBRE) for CWC Group	Whole document	Para 2.11 Agree evidence will need updating to reflect time period to 2040 would like additional consultation on new evidence.	Comments noted.
LPRPO609	G Allen (CBRE) for CWC Group	Policy NS1: New Settlement	Generally supported however further information is required. No evidence to support 10,000 consider not justified or effective. Work needs to be carried out now in order for the new settlement to deliver towards the end of the plan period. Option around Shenstone should be explored. CWC site could be combined with adjacent SHLAA site.	Comments noted. The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period.
LPRPO610	G Allen (CBRE) for CWC Group	Policy OHF1: Housing provision	Support use of 2014 projections in HEDNA, HEDNA should be extended to 2040. Support provision of 4,500 contribution to GBBCHMA shortfall. The growth would be better balanced across the District, particularly where this is provided in locations best able to contribute to the GBBCHMA. The LPR recognises that residents in Lichfield already commute to Birmingham and as such we consider that growth should be better located in closer proximity to the requirement - Birmingham conurbation.	Comments noted. A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO611	G Allen (CBRE) for CWC Group	Policy SHA1: Strategic housing allocation North of Lichfield	allocation of an additional 3,300 dwellings in this location will undoubtedly have transport implications potentially worsening impacts on the A38 and its junctions around Lichfield City and therefore slowing delivery as a result currently insufficient detail to understand the level of highways implications associated with additional development to the edge of Lichfield City. Consider housing growth would be better balanced across the District, and allocating a large proportion elsewhere, where impact on the A38 would be less. A suitable alternative would be north of Little Aston / south of Shenstone (of which our clients site could form part). The issues identified in the SA and SHLAA, are not too dissimilar to those for the north east Lichfield site, and can be overcome with the relevant technical evidence and site planning.	Comments noted. A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO612	K Fenwick (Pegasus Group) for Smith Brothers Farms Ltd	Whole document	should identify employment sites to deliver the requirements as recommended in the Housing and Economic Development Needs Assessment 2019, in order to clarify how the Council intends to deliver its employment land needs. clarified what type of plan the Council is drafting - full plan or two part plan?	Comments noted. Existing allocated employment areas are identified on the policies maps which accompanied the Preferred Options document. Current evidence suggests there are limited additional options for locating employment growth, this is explicitly referred to within the consultation document.

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LPRPO613	K Fenwick (Pegasus Group) for Smith Brothers Farms Ltd	Chapter 7: Our Vision	Broadly supported. Supported that larger sustainable settlements will enable future growth, however long term growth should apply to the entire District rather than just the new settlement to reflect the need for a balanced spatial strategy. Amend to state there is a commitment to deliver housing and particularly employment growth on a district wide basis. Vision to make specific reference to meeting the unmet housing needs of the GBBCHMA and to ensure the Council is meeting employment needs generated from within the housing market area.	Comments noted. Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed. Existing allocated employment areas are identified on the policies maps which accompanied the Preferred Options document.
LPRPO614	K Fenwick (Pegasus Group) for Smith Brothers Farms Ltd	Chapter 8: Our Strategic Objectives and Priorities	Generally supported. SO & P 1 Support larger service village settlements being identified for growth, should clarify that includes employment not just housing and should include land adjacent to them and green Belt release as necessary. SO & P 6 Strengthen to include Needs of wider GBBCHMA. SO & P 7 should include reference to planning applications that help to meet the recognised employment need of the district. SO & P 8 should be strengthened to refer to cross boundary employment needs. Clearer referencing and links throughout should be added, more detail to demonstrate viability and deliverability is required and the policies map should be referred to as a proposals map until adopted.	Comments noted. Existing allocated employment areas are identified on the policies maps which accompanied the Preferred Options document. Current evidence suggests there are limited additional options for locating employment growth, this is explicitly referred to within the consultation document.
LPRPO615	James Beynon (Quod) on behalf of Evans Property Group	Chapter FR3: Fradley economy	Draft policies OEET1 and FR3 of the Draft Plan supports the development and expansion of EEAs, including the Fradley Business Park, recognising the importance of local employment opportunities. Evans, therefore, respectfully request that the EEA Boundary is extended to includes the Orchard Farm site.	Comments noted.
LPRPO616	K Fenwick (Pegasus Group) for Smith Brothers Farms Ltd	Chapter OSS2: Our spatial strategy	Although a pro-active approach has been taken towards the contribution of dwellings, including the GBBCHMA shortfall, this needs to be balanced alongside employment growth. Policy OSS2 sets out the proposed areas for growth which will be focused on a number of strategic allocations which does not align with the OSS2 settlement hierarchy. This approach is not justified and is not a balanced strategy. This policy is unsound as it is not positively prepared, not justified, not effective and not consistent with national policy.	Comments noted. Comments noted. Existing allocated employment areas are identified on the policies maps which accompanied the Preferred Options document. Current evidence suggests there are limited additional options for locating employment growth, this is explicitly referred to within the consultation document.
LPRPO617	K Fenwick (Pegasus Group) for Smith Brothers Farms Ltd	Policy NS1: New settlement	Support identification through plan, consider unlikely that a new settlement will start delivering housing by 2040, but also it will not deliver any employment land. This does not provide the certainty that is a requirement of the plan-making process.	Comments noted. Existing allocated employment areas are identified on the policies maps which accompanied the Preferred Options document. Current evidence suggests there are limited additional options for locating employment growth, this is explicitly referred to within the consultation document.
LPRPO618	K Fenwick (Pegasus Group) for Smith Brothers Farms Ltd	Policy OSC1: Securing sustainable development	Revised wording suggested 'should not cause air quality standards to be exceeded'	Comments noted. Wording related to air quality to be reviewed.
LPRPO619	K Fenwick (Pegasus Group) for Smith Brothers Farms Ltd	Policy OSC3: Sustainable building standards for non-domestic buildings	Policy too onerous. Suggests amended wording.	Comments noted.
LPRPO620	K Fenwick (Pegasus Group) for Smith Brothers Farms Ltd	Policy OSC4: High quality design	Support approach that masterplans are required for developments of over 100 dwellings	Support noted.
LPRPO621	K Fenwick (Pegasus Group) for Smith Brothers Farms Ltd	Policy INF1: Delivering our Infrastructure	Support. Requires additional evidence, update IDP and consultation with SCC and highways modelling.	Comments noted. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review.
LPRPO622	K Fenwick (Pegasus Group) for Smith Brothers Farms Ltd	Chapter 12: Our sustainable transport	LP10ST Parking Provision - approach not justified.	Comments noted.
LPRPO623	James Beynon (Quod) on behalf of Evans Property Group	Chapter 14: Our economic growth, enterprise and tourism - Policy OEET1	There is a clear contradiction on draft Policy OEET1, and an ambiguity as to what tests must be satisfied for what uses. Clarity must be provided and Quod would strongly suggest that the latter tests outlined in Paragraph 6 of the draft Policy should only apply where there would be no employment generated – clearly some non-B class uses can still generate employment, and the Council recognise that these are appropriate in principle. It is therefore recommended that this is clarified, to define those non-employment generating uses that must satisfy these additional tests. Strategic Policy OEET1 (Paragraph 5) should be reworded to the effect of “Development proposals outside of the traditional employment uses (B1, B2 and B8) will be supported where it would enhance or complement the existing employment offer, and do not undermine the main purpose of the employment allocation”. Strategic Policy OEET1 (Paragraph 6) should be clarified to define an “employment generating use”, and confirm that the further tests (i.e. marketing/viability/environmental) only apply where there would be no employment generated whatsoever.	Comments noted
LPRPO624	James Beynon (Quod) on behalf of Evans Property Group	Whole document	Including this site within the Fradley Settlement Boundary would encourage its efficient use, and support the Council in “significantly boosting” their supply of housing in line with NPPF objectives. Quod respectfully request that the Fradley Settlement Boundary is amended to include the land parcel.	Comments noted
LPRPO625	K Fenwick (Pegasus Group) for Smith Brothers Farms Ltd	Chapter 14: Our economic growth, enterprise and tourism	Unclear how the figure of 61.3 hectares and 273,500sqm of floor space was reached. Only permits development within existing employment areas and allocations. It does not pay heed to identified local needs, particularly if employment land has been removed for other uses and not compensated for. Balancing exercise is required between employment and housing growth, as it may be the case that insufficient sites are available within the identified current employment areas, and thus further new locations for employment may therefore be required.	Comments noted. Existing allocated employment areas are identified on the policies maps which accompanied the Preferred Options document. Current evidence suggests there are limited additional options for locating employment growth, this is explicitly referred to within the consultation document.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO626	K Fenwick (Pegasus Group) for Smith Brothers Farms Ltd	Chapter 15: Our Healthy and Safe Communities & Policy OSHC1: Healthy and safe communities	Generally supported. Further work is needed on the evidence base and in relation to viability testing regarding infrastructure.	Comments noted. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review.
LPRPO627	Tim Beech	Policy ONR1:Green Belt	Object to loss of Green Belt in Burntwood, welcome new settlement outside of green belt	The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO628	K Fenwick (Pegasus Group) for Smith Brothers Farms Ltd	Policy ONR1:Green Belt	Recognition of the need to release Green Belt is welcomed. Further changes to the Green Belt should be addressed now not through Neighbourhood Plans.	Comments noted. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.
LPRPO629	K Fenwick (Pegasus Group) for Smith Brothers Farms Ltd	Policy ONR5: Natural and historic landscapes	Green Belt is not a landscape designation and is not a 'valued' landscape this policy makes reference to the Green Belt and should focus on the AONB and its immediate surroundings.	Comments noted
LPRPO630	K Fenwick (Pegasus Group) for Smith Brothers Farms Ltd	Policy S1: Shenstone environment, services and facilities	Should include reference to local green space to the north as defensible boundary. Vision includes reference to local service centre and should say larger service village. Largely supported but should plan for when facilities have been lost such as employment land, the Smith Bros site can create new employment opportunities and enable a thriving economy.	Comments noted.
LPRPO631	K Fenwick (Pegasus Group) for Smith Brothers Farms Ltd	Policy S2: Shenstone economy	To ensure the future provision of employment land for the local community is secured, the Smith Bros site should be allocated for employment development.	Comments noted. Existing allocated employment areas are identified on the policies maps which accompanied the Preferred Options document. Current evidence suggests there are limited additional options for locating employment growth
LPRPO632	Philip Sharpe Inland Waterways Association (Lichfield Branch)	Policy ONR1: Green Belt	There is no justification for developing yet more Green Belt south of Lichfield. None of the 3 currently designated SDAs has yet even started being built and the main future growth direction for the City is now recognised as to the northeast. This site includes a section of the Lichfield Canal currently under active restoration which should be recognised and protected. However, the Council failed to ensure that the undemocratically imposed Deanslade SDA contributed to or protected the restoration of the Lichfield Canal along its boundary, due to the incompetence and inconsistency of your planning department, and IWA can have no confidence that any future site at Fosseyway would benefit the canal. Removal of the land at Fosseyway Lane is based on an erroneous assessment and should not proceed. The designation of new Green Belt, whilst welcome in principle, is no substitute for retaining the existing Green Belt. Land should only be removed from the Green Belt in exceptional circumstances, and guessing that there might be a need to sacrifice yet more Green Belt beyond 2040 cannot be a proven exceptional justification for removing it now. These areas of so-called development restraint, which are intended to be the exact opposite, should be removed from this Plan.	Comments noted. The document identifies areas of 'Safeguarded Land' as defined within national policy. National policy states that consideration should be given that where changes to the Green Belt boundary are being proposed then areas of land between the urban area and the Green Belt (Safeguarded Land) should be identified to ensure the Green Belt boundary is capable of enduring beyond the plan period. The preferred options document identifies areas of such safeguarded land in conformity with national planning policy. Green Belt Review 2019 makes clear that 'exceptional circumstances' would need to be demonstrated if changes to the Green Belt boundary are proposed. This has been judged to be the case in the preferred options document as stated at paragraph 16.5 in terms of meeting development needs and the identification of new Green Belt to the north of Lichfield City.
LPRPO633	Philip Sharpe Inland Waterways Association (Lichfield Branch)	Policy ONR4: Green infrastructure and connectivity	IWA is pleased to see that the wording of the Local Plan Allocations Policy IP2: Lichfield Canal is carried forward, although we consider that it should remain a stand-alone policy with appropriate explanatory text. Subsuming it in the Green Infrastructure policy acknowledges this important contribution of the restoration scheme but does not give proper recognition of its other multi-functional benefits	Comments noted
LPRPO634	Philip Sharpe Inland Waterways Association (Lichfield Branch)	Policy OBHE1: Historic environment	Whilst supporting both these policies, IWA is concerned that the Council continues to ignore the case for designating the Coventry Canal and the Birmingham & Fazeley Canal within its boundaries as a Conservation Area. The West Midlands is at the heart of the historic canal network, which is a remarkable living legacy of the transport system that helped forge the world's first industrial revolution. Most of the other local canals have long since been designated Conservation Areas, including the Trent & Mersey Canal, Staffordshire & Worcestershire Canal, Ashby Canal, etc. but the Coventry and B&F canals with equal historic and architectural merit have been overlooked. The Council should commit to CA designation, and seek to work with neighbouring authorities in Tamworth, and Warwickshire to co-ordinate a complete coverage of the route, as was previously done with the other canals.	Comments noted
LPRPO635	Philip Sharpe Inland Waterways Association (Lichfield Branch)	Policy AH1: Armitage & Handsacre environment and services and facilities	IWA is pleased to see acknowledgement of the value and enhancement opportunities of the Trent & Mersey Canal in this policy and the Explanation text. We trust that this and the recognition of its position as a logical boundary to development will be reflected in any future Neighbourhood Plan proposals for further housing, which should be sited away from the canal.	Comments noted - neighbourhood plan allocations within any future NP would be subject to further scrutiny and cannot be confirmed at this current time.
LPRPO636	Philip Sharpe Inland Waterways Association (Lichfield Branch)	Policy SHA3: Strategic housing allocation land north and south of Hay End Lane	IWA fundamentally opposes any further strategic housing allocation at Fradley north of the Coventry Canal. The recent planning application for a mixed use development between the canal and Hay End Lane was rightly refused for reasons including harm to the setting of the Coventry Canal. However, there is no acknowledgement of the consequences of further development at Hay End Lane increasing road traffic over New Bridge on the canal at Gorse Lane. It is obvious that Gorse Lane will provide an important link between the sites. However, its narrowness and hump-back construction is wholly inadequate for any increased use. IWA will oppose any suggestion that it be demolished and replaced as it is an important part of the canal heritage.	Comments noted - the proposed allocations have been considered through the assessment of a number of evidence bases in considering appropriate sites for strategic allocations.
LPRPO637	Philip Sharpe Inland Waterways Association (Lichfield Branch)	Policy FR1 : Fradley environment	Should be made clearer that the new developments should finance towpath improvements and their ongoing higher maintenance costs necessary to cope with the increased footfall and cycle use consequent on that development.	Comments noted in terms of infrastructure. Policy SHA3 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO638	Philip Sharpe Inland Waterways Association (Lichfield Branch)	Policy NS1: New settlement	It is clear from the map that there are no locations within Lichfield District sufficiently far from existing towns to provide a truly independent new settlement.	Comments noted. The Local Plan Review seeks to set the direction of growth within the plan period and look toward provision for a future review of the plan.
LPRPO639	Philip Sharpe Inland Waterways Association (Lichfield Branch)	Policy OHF1: Housing provision	Land to the North -east of Lichfield 3,300 Agree that any further growth in housing provision in the district is best prioritised to the area north-east of Lichfield. This is outside the Green Belt, adjacent to the existing City, rather than being remote but dependant on it, and capable of incremental long term development to an overall plan that should integrate it with the existing City. However, it involves the loss of a large area of productive farmland and should not be prioritised over regeneration of brownfield sites in the conurbation. Land west of Fazeley 800 Given the scale of the proposed site north-east of Lichfield, which should be more than sufficient to provide for any realistic assessment of future need, there can be no justification for this large Green Belt site. The existing housing west of Fazeley is a sprawling linear settlement and if any addition to it can be justified then it should be an extension to the north or south to help physically consolidate the community. Land off Huddlesford Lane, Whittington 75 This relatively modest extension to the thriving existing village is not unreasonable. Land off Hay End Lane, Fradley 500 Fradley has been incrementally developed over the years without any long-term vision or coherent planning, resulting in 3 separate housing areas with poor connectivity and very limited and poorly sited facilities. This allocation should be deleted.	A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO640	K Fenwick (Pegasus Group) for Smith Brothers Farms Ltd	Whole document	Broadly support vision. S O & P should clarify applies to all development not just housing. Should review quality of employment land and Green Belt at Shenstone so there is a sufficient amount of employment land to meet requirements. Land promoted by Smith Brothers Farms would make a valuable contribution to the economic growth of the District.	Comments noted
LPRPO641	Philip Sharpe Inland Waterways Association (Lichfield Branch)	Whole document	The extent and the form of the proposed growth is essentially unsustainable, as it involves substantial loss of agricultural land in an overpopulated country that depends on importing much of its food from countries that are consequently destroying their natural environments to create more farmland.	Comments noted - assessment of the loss of agricultural land is considered within the plan making process.
LPRPO642	P Kreuser (CT Planning) on behalf of Little Aston Golf Club	Policy OSS2:Our spatial strategy	Support as appropriate that Little Aston is a level 3 service village.	Support noted.
LPRPO643	P Kreuser (CT Planning) on behalf of Little Aston Golf Club	Policy OHF1: Housing provision	Little Aston should be allocated a specific housing provision commensurate with the size of the settlement to support vitality and viability of services. Land is available off Little Aston Hall Drive.	Comments noted. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO644	K Grenfell	Policy SHA2: Strategic housing allocation land west of Fazeley	Appreciate need for affordable homes. How will adding 800 homes improve drainage/flooding from Plough PH to ABC computer shop, GP wait times, traffic when the roads of busy and dangerous Mile Oak junction, air quality - when added to the traffic for Drayton Manor Park and Ventura during holiday periods, climate change - loss of Green Belt, loss of landscape, habitats and species.	Comments noted. Policy SHA2 includes requirement for appropriate infrastructure as part of development of site and more clarity on this will be identified as the plan progresses.
LPRPO645	P Kreuser (CT Planning) on behalf of Friel Homes	Policy OSS2:Our Spatial Strategy	Site promoted is in sustainable location and on previously developed land, not clear how small to medium sized urban sites in Lichfield City will be identified.	Comments noted. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed. Strategy enables smaller settlement to grow and for local communities through Neighbourhood Plans to identify a non-strategic level of growth.
LPRPO646	P Kreuser (CT Planning) on behalf of Friel Homes	Policy OHF1: Housing Provision	Makes reference to the use of Neighbourhood Plans providing the means to allocate sites in certain named settlements or in the "wider rural area" but no reference is made to the future situation in Lichfield City. Should identify housing allocations in Lichfield City as part of this emerging Local Plan or through a Part 2 Allocations Plan. Land adjacent to and rear of Westgate House and the former Angel Croft Hotel should be identified as a housing allocation as it is sustainable location and previously developed land within the urban area.	Comments noted. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO647	A Smedley (Fisher Greman) for S Boston	Chapter 7: Our Vision	Vision and SO & P 2. Broadly support. Further agree that growth must be used to enhance sustainability of villages and ensure the viability of existing services and facilities that this may require the release of Green Belt land.	Comments noted. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.
LPRPO648	A Smedley (Fisher Greman) for S Boston	Policy OSS2: Our spatial strategy	Support plan period to 2040. In the short term small and medium sites can often greater resilience. Figure of 4,500 must be thoroughly examined in light of a lack of regional guidance or SoCG, consider figure should be 6,000. No objection to methodology which splits settlements into levels, consider weighting disproportionately tilted to accessibility via public transport. Consider distance to service centres and facilities is a more important metric for establishing sustainability than public transport as declining public transport services. Regarding the site at Longdon if the site had a bus route it would be elevated to a Level 4 Settlement at least. This reflects the good number of services and facilities within the village. Communities which are not allowed to grow can suffer negative consequences because outdated methodologies which do not reflect modern life.	Comments noted. Strategy enables smaller settlement to grow and for local communities through Neighbourhood Plans to identify a non-strategic level of growth.
LPRPO649	A Smedley (Fisher Greman) for S Boston	Policy OSC1: Securing sustainable development	Agree with reduce the need to travel, contend it should also include an aim to reduce the distances people travel also, to reduce the miles travelled by private car and also to encourage walking and cycling as a legitimate mode of transport.	Comments noted.

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LPRPO650	A Smedley (Fisher Greman) for S Boston	Policy OHF1: Housing provision	Support most growth being directed to Lichfield. However growth at Fradley and Fazeley is disproportionate and will have undue consequences on the ability of rural areas to maintain services and facilities and some growth should be directed to Longdon. As only wider rural areas will be agricultural conversions and infill, these will not deliver funding for infrastructure and affordable housing forcing those on lower incomes and first time buyers out of settlements. Unlikely figures for growth in rural areas will be achieved and restriction of development in Longdon is in conflict with vision and strategic objectives to support local services and facilities, such as local school. Should define how much housing is to be delivered in each neighbourhood plan area.	Comments noted. Strategy enables smaller settlement to grow and for local communities through Neighbourhood Plans to identify a non-strategic level of growth.
LPRPO651	A Smedley (Fisher Greman) for S Boston	Policy ONR1: Green Belt	Agree exceptional circumstances exist to justify Green Belt release. Consider Council should be delivering a higher amount of housing. Consider that housing requirements for the wider rural areas should be identified so that NPGs can effectively prepare Neighbourhood Plans and release land for development. Support ADR being identified. Consider Council should identify further non-strategic safeguarded land.	Comments noted. Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Strategy enables smaller settlement to grow and for local communities through Neighbourhood Plans to identify a non-strategic level of growth.
LPRPO652	A Smedley (Fisher Greman) for S Boston	Policy OR1: Smaller Rural Villages and our wider rural areas	Concerned with both the quantum of dwellings directed to the rural areas but also the lack of guidance from the Council as to how much development is to be delivered in each designated neighbourhood plan area. Non-delivery of new housing in such locations is in direct conflict with the Council's stated aims and vision, which clearly states new development will be delivered to meet housing needs and to help ensure sustainability by protecting the vitality and viability of rural services and facilities, suggest client's site at land to north of Longdon would have demonstrable positive social impacts.	Comments noted. Strategy enables smaller settlement to grow and for local communities through Neighbourhood Plans to identify a non-strategic level of growth.
LPRPO653	A Smedley (Fisher German) for Mercer Farms	Chapter 7: Our Vision	Vision and SO & P 2. Broadly support. Further agree that growth must be used to enhance sustainability of villages and ensure the viability of existing services and facilities. Support long term growth of a new settlement.	Support noted.
LPRPO654	A Smedley (Fisher German) for Mercer Farms	Policy OSS2:Our spatial strategy	Support plan period to 2040. In the short term small and medium sites can offer greater resilience. Figure of 4,500 must be thoroughly examined in light of a lack of regional guidance or SoCG, consider figure should be 6,000. No objection to methodology which splits settlements into levels, consider weighting disproportionately tilted to accessibility via public transport. Consider distance to service centres and facilities is a more important metric for establishing sustainability than public transport as declining public transport services. Regarding the client's site at Harlaston if the site had a bus route it would be elevated to a Level 4 Settlement at least. This reflects the good number of services and facilities within the village. Communities which are not allowed to grow can suffer negative consequences because outdated methodologies which do not reflect modern life.	Support noted. Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review. The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period.
LPRPO655	A Smedley (Fisher German) for Mercer Farms	Policy NS1: New settlement	Fully support. No justification for a settlement of 10,000, policy should be 1,500-10,000 dwellings.	Comments noted. The Local Plan Review seeks to set the direction of growth within the plan period and look toward provision for a future review of the plan.
LPRPO656	A Smedley (Fisher German) for Mercer Farms	Policy OSC1: Securing sustainable development	Agree with reduce the need to travel, contend it should also include an aim to reduce the distances people travel also, to reduce the miles travelled by private car and also to encourage walking and cycling as a legitimate mode of transport.	Comments noted
LPRPO657	A Smedley (Fisher German) for Mercer Farms	Policy OHF1: Housing provision	Support most growth being directed to Lichfield. However growth at Fradley and Fazeley is disproportionate and will have undue consequences on the ability of rural areas to maintain services and facilities and some growth should be directed to Harlaston. As only wider rural areas will be agricultural conversions and infill, these will not deliver funding for infrastructure and affordable housing forcing those on lower incomes and first time buyers out of settlements. Unlikely figures for growth in rural areas will be achieved and restriction of development in Harlaston is in conflict with vision and strategic objectives to support local services and facilities. Should define how much housing is to be delivered in each neighbourhood plan area.	Comments noted. Comments noted. Strategy enables smaller settlement to grow and for local communities through Neighbourhood Plans to identify a non-strategic level of growth.
LPRPO658	A Smedley (Fisher German) for Mercer Farms	Policy ONR1: Green Belt	Agree exceptional circumstances exist to justify Green Belt release. Consider Council should be delivering a higher amount of housing. Consider that client's land at Whittington Heath is suitable for a new settlement, subject to its release from the Green Belt. Support ADR being identified. Land for new settlement should be released from the Green Belt at this stage and could be identified as an ADR.	Comments noted. Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review. The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period.
LPRPO659	A Smedley (Fisher German) for Mercer Farms	Policy OR1: Smaller Rural Villages and our wider rural areas	Concerned with both the quantum of dwellings directed to the rural areas but also the lack of guidance from the Council as to how much development is to be delivered in each designated neighbourhood plan area. Non-delivery of new housing in such locations is in direct conflict with the Council's stated aims and vision, which clearly states new development will be delivered to meet housing needs and to help ensure sustainability by of its villages, suggest client's site at Scotland lane, Harlaston that does not necessitate Green Belt release and Packington Hall Farm, for 3,500 for a new settlement.	Comments noted. Strategy enables smaller settlement to grow and for local communities through Neighbourhood Plans to identify a non-strategic level of growth. Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.

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LPRPO660	Jacqui Russell	Policy ONR1: Green Belt	<p>Object to the proposal in Strategic Policy ONR1 to remove the land off Coulter Lane Burntwood from the green belt. Government guidance indicates that land should only be removed from green Belt in exceptional circumstances however there are no such exceptional circumstances. This proposal is in direct opposition to LDC's vision for Burntwood.</p> <p>Recent developments within Burntwood impacts on the local area where Doctors facilities and schools and roads are already significantly overstretched. Concerned why brownfield sites have not been looked as an alternative.</p>	Comments noted. The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO661	Neil Cox (Pegasus Group) on behalf of Bloor Homes	Chapter 3: National Context	<p>Bloor Homes supports the Council in continuing with a review of the Local Plan and the pro-active approach to ensure that an up to date policy framework exists with the District to guide growth to 2040 and to ensure that development is genuinely plan-led.</p> <p>Council should make it clear whether the Plan is a comprehensive plan or the first part of a two-part plan. The Local Development Scheme (LDS) is premised on this Plan being a comprehensive plan however Strategic Policy ONR1 makes reference to an Allocations document. Should be clarified what type of plan the Council is drafting as this will clearly impact upon how the policies need to be considered along with nature of supporting evidence which accompanies them.</p>	Comments noted.
LPRPO662	Neil Cox (Pegasus Group) on behalf of Bloor Homes	Chapter 7: Our vision and Chapter 8: Strategic objectives & priorities	<p>will be "creating a community that will be a place where families will aspire to live." This is supported in principle however this should apply to the entire District rather than just the new settlement to reflect the need for a balanced spatial strategy. The reference to the Council's "intention to focus our long-term growth in a new settlement," it should be made clear that this long-term growth relates to a contribution to growth beyond the plan period.</p> <p>The statement that "the Council has an aspiration to deliver housing and employment growth within our district" should be strengthened to state there is a clear commitment to delivering housing and employment growth in line with determined growth requirements. The development plan should provide certainty of delivery.</p> <p>Paragraph 7.4 it is stated that the Council does not consider it necessary for the Vision to make specific reference to meeting the unmet housing needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). Unclear how the Council reached this view and Bloor Homes considers this reference should be included in the Vision to demonstrate commitment to the statutory Duty to Co-operate.</p> <p>Approach to Strategic Objectives and Priorities is generally supported. Strategic Objective & Priority 1 'Sustainable Communities' is not clear as currently drafted. It makes reference to growth in a number of larger service village settlements and refers to the delivery of homes with supporting infrastructure in "our large settlements." The term 'large settlements' is open to interpretation and it is not clear how this relates to the identified settlement hierarchy. Contended that the objective should relate back to the preferred option for growth set out in the 'Preferred Options and Policy Directions' document, recognising that proportionate growth, in line with the settlement hierarchy will consolidate sustainable communities across the District.</p> <p>Strategic Objective 6 could be strengthened to refer to meeting the unmet housing needs of the wider GBBCHMA which includes Lichfield District.</p> <p>Local Plan would benefit from clearer referencing and linking throughout to demonstrate how the spatial strategy related back to the Vision, Strategic Objectives and Priorities. Currently there is a lack of detail which is needed to demonstrate the viability and deliverability of the strategy and robust evidence produced to enable meaningful engagement to ensure a sound plan.</p>	Comments noted

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO663	Neil Cox (Pegasus Group) on behalf of Bloor Homes	Policy OSS2: Our spatial strategy	<p>The approach of delivering Lichfield District's objectively assessed need as a minimum figure in line with the standard method is generally supported although it is recognised that the Housing & Economic Development Needs Assessment (HEDNA) recommends the Standard Method represents the minimum housing need, however Lichfield District Council is "encouraged to exceed this need with more provisions." Council should explain why it has not sought to increase planned housing provision above the Standard Method figure to address these issues.</p> <p>Pro-active approach taken towards GBBCHMA shortfall is welcomed however it is not clear how the figure of 4,500 dwellings has been identified. The GBBCHMA Strategic Growth Study identified locations for urban extensions and new settlements. None of these individually or combined result in the provision of 4,500 dwellings. Therefore it should be clarified in Policy OSS2 how the figure of 4,500 dwellings has been derived. South Staffordshire District Council and Cannock Chase District Council are both taking a similar approach and testing a contribution based upon the minimum levels of growth implied by the strategic areas of search identified within their areas in the Strategic Growth Study.. If LDC were to take this consistent approach the following contribution towards meeting the GBBCHMA shortfall would need to be taken: 20,000 dwellings in respect of the new settlement recommended areas of search, 6,000 dwellings in respect of the sustainable urban extensions recommended areas of search and additional growth in terms of 'proportionate dispersal' as recommended by the Strategic Growth study. The LPR should consider the Areas of Search identified in the Strategic Growth Study and where options have not been pursued, clearly set out the evidence and reason for this. The hierarchy set out in the policy is supported by the Settlement Sustainability Study (October 2018) and is supported by Bloor Homes.</p> <p>The policy sets out the proposed areas for growth which will be focused on a number of strategic allocations within Lichfield City, Fradley, Fazeley and Whittington. However, these proposed strategic allocations do not align with the settlement hierarchy set out within this policy as Burntwood is afforded no strategic allocation despite it being identified as the single Level 2 settlement, behind only Lichfield City.</p> <p>In addition, only three of the seven settlements listed in Level 3 are afforded new allocations of growth. Contended that Policy OSS2 is not justified and does not provide a considered and justified spatial strategy. References to specific allocations should be removed from this policy and Table 3.1 Overall Distribution of New Homes should be included in place of this as this sets out where all growth will be directed, not just that which relates to proposed strategic allocations.</p>	<p>Comments noted. Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review.</p> <p>The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period.</p> <p>Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.</p>
LPRPO664	Neil Cox (Pegasus Group) on behalf of Bloor Homes	Policy NS1: New settlement	<p>Acknowledged that in accordance with the Strategic Growth Study, the Council have indicated its support for a new settlement of around 10,000 dwellings within the District. Agrees that any new settlement would not deliver homes within the next 15 years and therefore cannot be relied upon as a potential source of supply in this Plan.</p> <p>Considers it unlikely that a 10,000 dwelling new settlement will start delivering housing by 2040 if the location is not yet known. The Strategic Growth Study acknowledged that there is significant lead in time to delivery of large strategic sites.</p>	Comments noted.
LPRPO665	Neil Cox (Pegasus Group) on behalf of Bloor Homes	Chapter 10: Our sustainable communities	<p>Approach to sustainable development, set out in Policy OSC1, is generally supported where it is consistent with national policy. Policy wording in relation to air quality states that "no decline in standards being deemed acceptable as a result of new development." This wording is not clear and it is suggested should be clarified that its intention is that new development should not cause air quality standards to be exceeded.</p> <p>Approach to securing high quality design as set out in Policy OSC4 is generally supported however should be updated to reflect national design policy guidance. It is noted that masterplans are required for strategic developments (defined as over 100 dwellings) only. This approach is supported.</p> <p>The approach to flood risk, sustainable drainage and water quality as set out in Policy OSC5 is broadly supported but again the wording needs to be amended to reflect national policy and guidance.</p>	Comments noted. Wording related to air quality to be reviewed.
LPRPO666	Neil Cox (Pegasus Group) on behalf of Bloor Homes	Policy INF1: Delivering our infrastructure	<p>Draft policy is supported however it is considered there needs to be additional evidence published in support of the Local Plan Review regarding infrastructure in order to provide clarity over what additional infrastructure is required to support the Local Plan Review allocations and how this will be delivered.</p> <p>Should include an update to the Infrastructure Delivery Plan (IDP) and further consultation with the County Council and other relevant consultees on matters such as highways modelling and education provision. The National Planning Practice Guidance (NPPG) on viability is clear that the drafting of plan policies should be informed by engagement with developers, landowners and infrastructure and affordable housing providers.</p>	Comments noted. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review.
LPRPO667	Neil Cox (Pegasus Group) on behalf of Bloor Homes	Chapter 12: Our sustainable transport	<p>Noted that parking provision will continue to be determined with reference to the Sustainable Development Supplementary Planning Document (SPD). This is not in line with national policy which states that maximum parking standards should only be set where there is clear and compelling justification that they are necessary for managing the local road network or for optimising density of developments in centres or areas well served by public transport. This justification has not been clearly provided. It is noted that the policy provides greater flexibility for the provision of parking to be considered for specific development proposals and this is supported.</p>	Comments noted

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO668	Neil Cox (Pegasus Group) on behalf of Bloor Homes	Policy OHF1: Housing provision	<p>There are four strategic development allocations/ areas listed in the policy alongside approximate numbers of new homes they will deliver. However, it is not clear how the proposed allocations relate to the spatial strategy policy and settlement hierarchy and the approach seems rather 'ad hoc' and has not been justified. Proposed levels of growth vary significantly between settlements, including those at the same level in the settlement hierarchy. Burntwood for example is only allocated a further 438 dwellings to 2040, despite it being a Level 2 settlement.</p> <p>No transparency on how the Council has differentiated between 'strategic' and 'non-strategic' levels of growth identified for each settlement. This is of particular importance as the Council is currently proposing that non-strategic levels of growth are to be dealt with through allocations within the Neighbourhood Plans process: an approach not supported by Bloor Homes.</p> <p>Bloor Homes contend that in many cases, including within Burntwood, the delivery of the non-strategic requirement assigned to the settlement is necessary to deliver the District's housing requirement and both the Vision for both the District and for Burntwood. The range of proposed 'strategic' allocations ranges in scale from 75 to 3,300 dwellings it therefore it is inconsistent that the planned growth of 400 dwellings within Burntwood is considered non-strategic. Council's own evidence (SHLAA 2019) identifies there is not the capacity within the existing urban area to deliver the growth requirement of 400 dwellings assigned to Burntwood. Table 4.1 within the SHLAA demonstrates a yield of only 6 dwellings can be achieved on 'deliverable' sites outside of the Green Belt and only 42 dwellings achieved on 'developable' sites outside the Green Belt. Therefore land will be required to be removed from the Green Belt within this plan to support the vast majority of the requirement for this plan period.</p> <p>Approach of leaving the allocation of 'non-strategic' sites to Neighbourhood Plans is not supported. Approach is not consistent with national policy. Policy OHF1 should reflect paragraph 65 of the NPPF in that the housing requirement figures should reflect the overall strategy for the pattern and scale of development and any relevant allocations. Would be helpful to assign rural parishes included in the 'wider rural area' or given the whole district is parished, assign a minimum requirement figure for each parish.</p> <p>Supporting text states that the Council will 'make provision for' at least 11,800 dwellings between 2018-2040, wording should be strengthened to 'will deliver'. The total housing allocations identified provide 11,568 dwellings it should be clarified in supporting text if the balance (232 dwellings) is to be made up via windfall developments and how these assumptions have been arrived at.</p> <p>The current strategy is heavily reliant on a single large site to deliver the overall housing requirement (Land North East of Lichfield), this is not supported by detailed evidence to show work has progressed sufficiently to demonstrate deliverability of these during the plan period.</p>	<p>Comments noted. The Preferred Options document sets the spatial distribution of growth, including strategic housing allocations and housing requirements for settlements and levels of the settlement hierarchy. A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.</p> <p>Strategy enables smaller settlement to grow and for local communities through Neighbourhood Plans to identify a non-strategic level of growth.</p>
LPRPO669	Neil Cox (Pegasus Group) on behalf of Bloor Homes	Chapter 13: Our homes for the future & Policy OHF2: Providing a Balanced Housing Market and Optimising Housing Density	<p>Concerned that in its current form Policy OHF2, by referring to specific percentage figures, the plan lacks sufficient flexibility to meet changing housing needs across the District and the Plan period. Submitted that the most appropriate approach to housing mix is to continue to be guided by market signals, as defined with the most up-to-date Strategic Housing Market Assessment (SHMA).</p> <p>Acknowledged that the Council has produced a Housing and Economic Development Needs Assessment (HEDNA) which does consider housing needs and could be referred to in this policy. However, it is not clear from the HEDNA how the housing mix has been derived using detailed local evidence in line with the requirements set out in the National Planning Policy Guidance (NPPG) on how to produce a HEDNA. This should be clarified in the document.</p> <p>Policy lacks flexibility to reflect differences across sub-market areas; changing needs over plan period and site-specific considerations which will influence mix that can be delivered on individual sites. Plan proposes 4,500 additional homes to meet the needs of GBBCHMA. Housing needs of neighbouring authorities will be of consideration in determining housing mix on developments.</p> <p>Policy sets out minimum net density of 35 dwellings per hectare, considered to be broadly appropriate. Developments in Lichfield City, Burntwood and other locations with good public transport will be expected to achieve higher densities of approx. 50 dwellings per hectare which is broadly supported.</p>	<p>Comments noted. Proposed policy OHF2 seeks to deliver a mix of dwellings to meet the needs of the District's demographic including provision of starter and affordable homes and smaller homes. Evidence in relation to viability and the level of a affordable homes to be required is being collected.</p>
LPRPO670	Neil Cox (Pegasus Group) on behalf of Bloor Homes	Policy OHF4: Affordable housing	<p>Lack of specific affordable housing threshold in the policy does not accord with the NPPF or PPG. National policy requires a Local Plan to set an affordable housing percentage which should be subject to viability testing to confirm an appropriate figure. National policy clearly requires a Local Plan to set an affordable housing requirement which this policy currently lacks. The policy should be amended to state an affordable housing percentage requirement. This should be subject to viability testing to confirm an appropriate figure.</p> <p>Policy seeks to allow flexibility in the tenure, size and type of affordable housing on a scheme by scheme basis. This flexibility is supported and should be delivered with reference to the most up to date SHMA. The initial viability evidence indicated that 0%, 20%, 30% and 40% would be tested on major development sites. This evidence has determined that a figure of 40% is unlikely to be viable.</p>	<p>Comments noted. Evidence within the HEDNA suggests the Council will be justified in seeking to achieve as much affordable housing as viably possible on appropriate development sites. Further viability evidence is being collected which will inform the policy and provide a clear position in terms of the appropriate level of affordable housing to be sought.</p>
LPRPO671	Neil Cox (Pegasus Group) on behalf of Bloor Homes	Chapter 14: Our Economic growth, enterprise & Tourism & Policy OEET1: Our Employment and Economic Development	<p>Policy OEET1 states that approximately 61 hectares of land will be allocated for employment use in accordance with the Housing and Economic Development Needs Assessment 2019. It is not clear why the current consultation document has not identified any employment sites and it should be clarified how the Council intends to deliver its employment land needs.</p> <p>Council's aspirations for economic growth are welcomed as part of a balanced sustainable strategy.</p>	<p>Comments noted. Existing allocated employment areas are identified on the policies maps which accompanied the Preferred Options document. Current evidence suggests there are limited additional options for locating employment growth, this is explicitly referred to within the consultation document.</p>

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO672	Neil Cox (Pegasus Group) on behalf of Bloor Homes	Chapter 15: Our Healthy and Safe Communities & Policy OSHC1: Healthy and Safe Communities	<p>Approach to healthy and safe communities in Policy OSHC1 is generally supported.</p> <p>However, the policy states that health and education infrastructure requirements related to strategic development proposals will need to be understood and determined through the Local Plan and accompanying evidence base so that it is clearly demonstrated that the strategic allocations are deliverable. Infrastructure requirements for strategic sites will also need to be considered by the viability process which national policy requires to be considered through the Local Plan. Further work is needed on the evidence base and in relation to viability testing regarding infrastructure.</p>	Comments noted. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review.
LPRPO673	Neil Cox (Pegasus Group) on behalf of Bloor Homes	Policy ONR1: Green Belt	<p>As currently drafted the policy covers both strategic and development matters related to Green Belt, it is suggested it would be clearer to separate these concerns into separate policies.</p> <p>There is an acceptance by the District Council that there needs to be changes to the Green Belt boundary to accommodate growth requirements to 2040. This recognition is welcomed and it is clear that the Council has started to produce the exceptional circumstances justification for such a release, but this needs to be supported by further evidence.</p> <p>Policy seeks to propose new Green Belt land to define the northern extent of Lichfield City and prevent the coalescence of Lichfield and Fradley. NPPF is clear that any new proposals for Green Belts should only be established in exceptional circumstances and be set out in strategic policies. It needs to be demonstrated that the proposed new Green Belt between Lichfield and Fradley meets the test.</p> <p>Policy states that further 'non-strategic' changes to the Green Belt may be appropriate, but boundaries will be determined through Neighbourhood Plans or the allocations document. This approach is not appropriate, given the strategic importance of Green Belt delivering the overall proposed spatial strategy for the District. If the Neighbourhood Plans fail to progress and allocate sites by a specified date, or housing delivery within the District fails to maintain a five year supply of deliverable land, the Local Plan should include a mechanism to release the ADRs early. The Green Belt policy should be amended to reflect this.</p> <p>Identification of Area of Development Restraint is supported in principle, however it is not clear why only three Areas of Development Restraint have been identified and it is questioned whether this will be sufficient to ensure Green Belt boundaries endure beyond 2040 as per the requirements of the NPPF, and in the case of Burntwood, the ADR that has been identified is required to meet housing needs within the plan period</p> <p>There is a clear role for the identified ADRs to provide a 'backstop' option for the housing requirements currently left for Neighbourhood Plans to allocate. Green Belt policy should be amended to include a mechanism to release ADRs early if Neighbourhood Plans fail to progress and allocate sites by a specified date. ADRs should also be referred to in line with national policy terminology (safeguarded land) for clarity.</p>	<p>Comments noted. Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.</p> <p>The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.</p>
LPRPO674	Neil Cox (Pegasus Group) on behalf of Bloor Homes	Chapter 16: Our Natural Resources	<p>Approach to habitats and biodiversity set out within Policy ONR2 is generally supported where it is consistent with national policy. Draft policy continues to include biodiversity net gain requirement, supporting text clarifies this will be assessed through Natural England's biodiversity metric. The Government intends to publish standardised guidance on this so policy wording should be amended to include future documents.</p> <p>Policy ONR5 addresses natural and historic landscape, whilst the policy focuses on the AONB, it also references the West Midlands Green Belt. It is contended that Green Belt is not a landscape designation or a 'valued' landscape. Unclear why the policy makes reference to Green Belt. Any policy text regarding beneficial use of the Green Belt should be included in Green Belt Policy (ONR1).</p>	Comments noted. Wording relating to Policy ONR5 to be reviewed.

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LPRPO675	Neil Cox (Pegasus Group) on behalf of Bloor Homes	Policy SHA1: Strategic Housing Allocation North of Lichfield	<p>SHA1 proposes 3,300 new dwellings between two housing allocations; Land North East of Watery Lane and Land at Streethay. Development has started on the Streethay allocation it has not commenced on the Watery Lane site. Given that outline consent was granted in February 2017 and RM permissions for the spine road and green infrastructure was only granted in August 2019. the Council will need to be satisfied that here are no underlying issues preventing delivery of this new wider allocation. There needs to be clear evidence this site is deliverable within suitable timescales and at proposed numbers.</p> <p>Councils housing trajectory needs to clearly consider the impacts of allocating approx. 70% of the proposed dwellings allocated through this plan to a single site that will deliver later in the plan period. If this allocation were to experience any difficulties and delays there will be issues relating to land supply.</p> <p>Proposed allocation North of Lichfield is poorly connected to the rest of the City and is reliant on only two principal connecting roads. Existing railway line separates the proposed allocation from the rest of the City, will pose a challenge to create a sustainable community which integrates with existing residents.</p> <p>Lack of evidence that physical infrastructure can be viably upgraded to accommodate a development of the scale proposed. Significant work is needed to upgrade local and strategic highway network along with schools and healthcare infrastructure. Significant input from County Council, Highways England and other stakeholders to ensure relevant modelling is undertaken to test the allocation and identify is required infrastructure can be delivered. Absence of evidence highlights questions over the deliverability of the proposed allocation.</p> <p>Suggested that the Council's requirement should be spread across a number of sites of differing scales and across all sustainable settlements rather than concentrating the majority of growth to within a single large allocation in this locations.</p> <p>Council's proposed approach significantly restricts the flexibility and undermines deliverability of the spatial strategy.</p>	Comments noted
LPRPO676	Neil Cox (Pegasus Group) on behalf of Bloor Homes	Whole document & Sustainability appraisal	<p>SA document needs to provide further narrative to explain how the spatial strategy and associated allocations were selected over reasonable alternatives. It set out at Section 2.4 that the spatial strategy reflects a combination of Residential Growth Options 2 and 4 and Employment Growth Option 1, but no clear narrative explaining how selections were made. There is also no explanation of how 4,500 dwellings contribution towards the GBBCHMA shortfall has been determined.</p> <p>Paragraph 2.6.3 confirms no employment sites are identified at the Preferred Options stage, it is unclear why this is and effectively results in the implementation of the 'do nothing' approach to employment. This should be justified in the SA.</p> <p>It is noted that sites that are not deemed to be strategic in nature are excluded from the assessment. However, the cumulative impact of non-strategic sites can contribute towards a sustainable, balanced strategy and therefore does form a reasonable alternative which should be included and considered by the SA.</p> <p>When assessing the long-term effects in Section 2.8, the assumption was made that mitigation measures have been proposed that these have been applied. Helpful if this section clarified what the mitigation measures are and who has proposed them.</p> <p>The key national plans, policies and programmes fails to make reference to the government policies regarding delivery of homes, with the NPPF reiterating the Government's objective of significantly boosting the supply of homes (Paragraph 59). This is key consideration in the drafting of the Plan and the accompanying SA and should be included.</p> <p>Section 4 needs to clearly justify how the preferred spatial option has been arrived at having regard to all 'reasonable' alternatives. It should also justify how the 4,500 dwelling contribution towards the GBBCHMA has been derived. The identification of new strategic allocations is supported however this needs to form part of a balanced strategy. The proposed allocations are focused on Lichfield and other larger service villages: Fradley; Fazeley; and, Whittington. The inclusion of allocations at four settlements does not represent a balanced strategy. This does not align with Strategic Policy OSS2 (as set out at paragraph 2.4.7) which states new growth/development will be directed to the most sustainable locations via a hierarchy of centres and settlements. The proposal to allocate sites in four settlements does not align with this aim.</p>	Comments noted

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LPRPO677	Neil Cox (Pegasus Group) on behalf of Bloor Homes	Whole document	<p>Promoting a 27.3ha site north east of Burntwood - Land at Coulter Lane (SHLAA ref: 172 & 267). Accompanied by a site plan, promotional document and economic benefits document.</p> <p>Proposed development of approximately 480 dwellings at an average density of 35 dwellings per net hectare; Vehicular access provided via Church Road and Coulter Lane; Opportunity to provide linkages to land to the west being promoted by others, to ensure a comprehensive sustainable scheme that promotes permeability; Provision of a comprehensive network of pedestrian and cycle routes maximising the opportunity of attractive car-free landscape corridors, including a potential link to Fulfen primary school; Creation of a sustainable and balanced residential development that reflects the housing mix contained within the most up to date Strategic Housing Market Assessment and Housing Needs Study; Provision of new green spaces and the retention of existing landscape features, field patterns and the site high point and associated contextual views; Provision of a new Green Belt boundary to the north of the site using physical landscape features.</p> <p>Benefits of the development; Temporary employment supported by the construction phase; Contribution of the construction phase to economic output; Growing labour force; Household spend; Increased Council Tax income; CIL Receipts; Affordable housing delivery.</p> <p>Development of Coulter Lane would be aligned to the Councils preferred strategic option for growth, which would see new homes focused on the most sustainable settlements within the District, including Burntwood. Development of Coulter Lane would assist in: Consolidating the sustainability of the existing urban settlement of Burntwood as one of the District's two principal service centres; Providing improved infrastructure to support new and existing communities within Burntwood; Providing improved public transport provision within Burntwood; Supporting the delivery of an improved and enlarged town centre; Improving outdoor, indoor leisure and cultural facilities within Burntwood.</p> <p>Development of land at Coulter Lane would ensure any Green Belt release only includes land that plays a moderate, rather than important role, against Green Belt purpose. Site is available and deliverable as noted in the 2019 SHLAA and capable of delivering in full prior to 2040.</p>	Comments noted
LPRPO678	Philippa Kreuser (CT Planning) on behalf of the Thorpe Estate	Policy NS1: New settlement	<p>Support Lichfield District Council's proposal to include Preferred Policy NS1: New Settlement in the emerging Local Plan. It is essential that the location of a new settlement is identified in the Local Plan as soon as possible. It will require a significant commitment from the development industry to start delivering homes by 2040 as sought by Policy NS1. Given that there will inevitably be a 10 year lead time to bring forward a strategic development of this magnitude, early identification of the location of the new settlement will bring certainty and confidence to landowners and developers. It is submitted that Land at Thorpe Constantine comprises a suitable location for a new settlement.</p>	Comments noted
LPRPO679	Fisher German on behalf of Mr S W Bostock	Policy OSS2: Our spatial strategy	<p>Support extension of plan to 2040. Strategic planning needs to have a long term view to be effective. Consider that an increase in provision of dwellings during this plan period is required. No objection to methodology splitting settlements within the hierarchy however find the weighting disproportionately tilted to accessibility via public transport. Consider Clifton Campville a suitable location for future development (promoting site)</p>	Comments noted.
LPRPO680	Fisher German on behalf of Mr S W Bostock	Policy OHF1: Housing provision	<p>Concerns in the way settlements have been scored, these can be remedied not only by a change to the spatial hierarchy and methodology, but also by adopting a more pragmatic approach to the distribution of housing through the district. Consider that some of that growth planned at Fradley and Fazeley, Mile Oak and Bonehill should be directed towards sustainable settlements such as Clifton Campville, further down the hierarchy, and not at the expense of them.</p> <p>Within the wider rural areas, only 200 additional dwellings are proposed above the 366 existing commitments, giving a total of only 566 dwellings over the next 20 years. Given many dwellings will be delivered through agricultural building conversions (predominantly through Class Q PD rights) outside of settlements, the amount of development to be delivered within villages is likely to be somewhat lower than this.</p> <p>Have concerns that by encouraging only infill developments in rural settlements can have further unintended consequences. Many local authorities chose now not to adopt settlement boundaries as they create a presumption in favour of infill development and garden grabbing which can be damaging to the overall character of a settlement. Such developments can serve to urbanise existing villages by removing green and open spaces. We contend that limited, sensitive growth on village boundaries can, in many cases, actually be less damaging than cramming new development into limited areas within defined settlement boundaries having a negative effect on village character and aesthetic.</p> <p>Also, in villages such as Clifton Campville, where a Neighbourhood Plan is not being prepared, there is a risk that such villages will miss out on growth which would be of benefit to their future sustainability. As such, allocations in the villages should be provided by the District's Local Plan.</p>	Comments noted. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed. Strategy enables smaller settlement to grow and for local communities through Neighbourhood Plans to identify a non-strategic level of growth.
LPRPO681	Fisher German on behalf of Mr S W Bostock	Policy OR1: Smaller Rural Villages and our wider rural areas	<p>Are concerned by both the number of dwellings directed to the rural areas.</p> <p>In order for the Plan to be consistent with its own vision and objectives, we consider that the Council should allocate growth to settlements such as Clifton Campville to assist in meeting both the wider District's housing needs, but also local housing need.</p>	Comments noted. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed. Strategy enables smaller settlement to grow and for local communities through Neighbourhood Plans to identify a non-strategic level of growth.

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LPRPO682	Elford Parish Council	Policy OR1: Smaller Rural Villages and our wider rural areas	<p>Rural development on farms and outlying properties should be of an appropriate scale and type rather than commercial or light industrial development and this should be stated in the Local Plan Review for the avoidance of doubt.</p> <p>Sustainability of rural settlements will be improved by the provision of public transport in areas not currently served by this, and Lichfield District Council should work with the County Council and transport providers to ensure that this is improved during the lifetime of the Local Plan.</p>	Comments noted. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review.
LPRPO683	Fisher German on behalf of GR Hemus	Policy OSS2: Our Spatial strategy	<p>The adopted methodology disproportionately impacts settlements with limited access to public transport, in a way not commensurate with the Council's evidence on people's travel patterns. As such, we consider that distance to service centres and facilities is a more important metric for establishing sustainability than public transport, and thus deserves equal if not greater weighting.</p> <p>The Council's adopted methodology risks isolating sustainable settlements from new development, which will likely have unintended consequences such as the ageing the settlement population and the closure of services and facilities, by virtue of becoming unviable.</p> <p>In terms of Drayton Bassett, it is ranked as the 20th most sustainable rural settlement (Lichfield District Council, Settlement Sustainability Study 2018). The village contains a Primary School, Church, Village Club. The Settlement Sustainability Study doesn't recognise that the village also has a Playing field with Play Area and a Mobile General Store visits the village on a Monday and Wednesday. Without any further development at Drayton Bassett these existing services are at risk of no longer being viable.</p> <p>However, it should be noted that Drayton Bassett is located in very close proximity to Fazeley and Tamworth which do provide services, facilities and employment opportunities. A number of shops at Fazeley (including a Tesco Express, Pharmacy, Takeaway outlets and a Post Office) are located at the A4091 Coleshill Road /B5404 Atherstone Street roundabout. This is only a 3-minute drive/30-minute walk/8-minute cycle from the site (approx. 2.8 km) and therefore it is reasonable to assume that these would serve a development in the village. Bus stops on the B5404/Atherstone Street are served by buses to Tamworth Town Centre (16 and 16a services) and Birmingham (110 Sapphire Service). Also, a number of employment opportunities are available in close proximity to Drayton Bassett including at the Drayton Manor Industrial Estate (Coleshill Road) and the Riverside Industrial Estate (Atherstone Road). Additionally, the nearby Drayton Manor Theme Park provides seasonal work on a flexible basis.</p> <p>We agree with the conclusions of this report, and recognise the negative consequences faced by communities which are not allowed to grow. We also agree that too often outdated methodologies are used when ranking settlements, which does not reflect modern life or evidence</p>	Comments noted. Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO684	Fisher German on behalf of GR Hemus	Policy OHF1: Housing provision	<p>Whilst we have concerns in the way settlements have been scored as outlined above, these can be remedied not only by a change to the spatial hierarchy and methodology, but also by adopting a more pragmatic approach to the distribution of housing through the district. The requirement for new development to be delivered as infill, within village boundaries will further restrict the number of new dwellings coming forward. This approach means that any new development will be likely be small and piecemeal in nature. There are several disadvantages to this approach. Firstly, small developments fall below the thresholds for affordable housing and Section 106 contributions. This means the population will grow without the requisite funding for infrastructure, including for example, education contributions. The lack of larger schemes coming forward will also have a negative impact in that affordable housing is unlikely to be delivered, forcing those on lower incomes or first-time buyers out of settlements.</p> <p>Beyond the above, we have concerns that by encouraging only infill developments in rural settlements can have further unintended consequences. Many local authorities chose now not to adopt settlement boundaries as they create a presumption in favour of infill development and garden grabbing which can be damaging to the overall character of a settlement. Such developments can serve to urbanise existing villages by removing green and open spaces. We contend that limited, sensitive growth on village boundaries can, in many cases, actually be less damaging than cramming new development into limited areas within defined settlement boundaries having a negative effect on village character and aesthetic.</p> <p>The restriction of development in locations such as Drayton Basset is in direct conflict with the vision and strategic objectives which seek to support local services and facilities with new development. In reality the lack of any Green Belt release in Drayton Bassett essentially condemns the village to stagnation, where the population will likely age. This can result in less children in the settlement, meaning the school will likely need to rely on out of catchment pupils to ensure an operational capacity is maintained or be at risk of closure. Clearly the provision of a sensitive new development enables the delivery of family homes but can also deliver affordable homes and homes suitable for downsizing, which may also free up some of the existing larger, family housing stock in the village for families to move into.</p> <p>In villages such as Drayton Bassett, where a Neighbourhood Plan is not being prepared, there is a risk that such villages will miss out on growth which would be of benefit to their future sustainability. As such, allocations in the villages should be provided by the District's Local Plan.</p>	Comments noted. Comments noted. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed. Strategy enables smaller settlement to grow and for local communities through Neighbourhood Plans to identify a non-strategic level of growth.

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LPRPO685	Fisher German on behalf of GR Hemus	Policy ONR1: Green Belt	<p>Do not consider the Council's approach goes far enough, particularly with regards to growth in the rural areas, which is needed to support services and facilities in line with the Plan's vision and objectives.</p> <p>Consider that further non-strategic changes to the Green Belt boundary could be appropriate for all settlements within the Green Belt. However, we consider that the Council should be delivering a higher amount of housing (to meet Birmingham's unmet needs) and therefore additional Green Belt release at more settlements than currently proposed is required to facilitate additional residential allocations.</p> <p>The Plan Review states that precise boundaries of such changes will be determined through neighbourhood plans or the allocations document. However, aligned with our commentary regarding Policy OHF1: Housing Provision. It is considered that housing requirements for the wider rural areas should be identified in this plan so that both the site allocation document and Neighbourhood Plans can plan to release land for development.</p> <p>In addition, we support the Council in identifying Areas of Development Restraint to be released from the Green Belt.</p>	<p>Comments noted. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes. Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review.</p> <p>The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period.</p>
LPRPO686	Fisher German on behalf of GR Hemus	Policy OR1: Smaller Rural Villages and our wider rural areas	<p>Concerned by both the number of dwellings directed to the rural areas. In order for the Plan to be consistent with its own vision and objectives, we consider that the Council should allocate growth to settlements such as Drayton Bassett to assist in meeting both the wider District's housing needs, but also local housing need.</p>	<p>Comments noted. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed. Strategy enables smaller settlement to grow and for local communities through Neighbourhood Plans to identify a non-strategic level of growth.</p>
LPRPO687	D Mottram	Policy ONR1: Green Belt	<p>I strongly object to one aspect of this document, namely the proposal in Strategic Policy ONR1: Green Belt to remove the land off Coulter Lane (parcels of land Burntwood 2 and St Matthews 6) from the Green Belt. Concern that impact upon Fulfen Farm listed building not considered. No exceptional circumstances mentioned. Should focus on land that is already available.</p>	<p>Comments noted. The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.</p>
LPRPO688	D Mottram	Whole document	<p>Green Belt review. Can see nothing in this document to justify such exceptional circumstances.</p>	<p>Comments noted. The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.</p>
LPRPO689	S Locke (Hinson Parry and Company) for Mr Greaves	Policy ONR1: Green Belts	<p>The line of the HS2 route has been incorrectly defined on the current proposals plans. The line of the HS2 line runs east of the site and will provide a suitably-wide development stop between the strategic housing land and the proposed new employment land to the east at Fradley. The growth requirements around Lichfield do not need to result in changes in the Green Belt boundary as currently there is no green belt to the north east of the city and including new green belt would have limited benefits. need for the land at Curborough Sprint Track and the land east of the strategic housing land for allocation as green belt has not been demonstrated. The land forms a strip along the line of HS2 which will in itself define the eastern development edge of the settlement and prevent the coalescence of Lichfield and Fradley. The NPPF makes clear that changes should only be made to the Green Belt boundary in exceptional circumstances. The strip of land between the HS2 line and the strategic housing land at Lichfield has limited value in Green Belt terms and should not be designated as new Green Belt. We are not saying that no additional land is designated as Green belt. The land north of Lichfield can be expanded with Green belt designation to offset the new development proposed. The land at Curborough Sprint Track and the land to the south east of this site makes a lower contribution to the physical and visual openness of the Green Belt.</p>	<p>Comments noted. Green Belt Review 2019 makes clear that 'exceptional circumstances' would need to be demonstrated if changes to the Green Belt boundary are proposed. This has been judged to be the case in the preferred options document as stated at paragraph 16.5 in terms of meeting development needs and the identification of new Green Belt to the north of Lichfield City.</p>
LPRPO690	S Locke (Hinson Parry and Company) for Mr Greaves	Policy SHA1: Strategic housing allocation North of Lichfield	<p>The new policy SHA1 policy does not mention expanding the green belt around the site. If the narrow strip of land between the strategic housing allocation site at Lichfield and the HS2 line is designated as Green Belt it will become underutilised. It will be extremely difficult to farm and will result in an area of wasteland. The area needs to be included as part of the overall masterplan for the main strategic residential site which will help to meet sustainable development needs.</p>	<p>Comments noted. Green Belt Review 2019 makes clear that 'exceptional circumstances' would need to be demonstrated if changes to the Green Belt boundary are proposed. This has been judged to be the case in the preferred options document as stated at paragraph 16.5 in terms of meeting development needs and the identification of new Green Belt to the north of Lichfield City.</p>
LPRPO691	D2 Planning (Laura Wilkinson) on behalf of LCP Limited	Policy OSS2:Our Spatial Strategy	<p>Supportive of the identification of Burntwood as 'Level 2 – Other Main Centre'. They also strongly support the policy requirement for there to be a reuse of previously developed land and efficient use of land in sustainable locations as a key priority for the district.</p>	<p>Support noted</p>

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO692	D2 Planning (Laura Wilkinson) on behalf of LCP Limited	Policy OHF1: Housing provision	<p>The Housing Provision outlined in OHF1 is supported. The policy states that housing development will be focused upon the existing built/urban areas and the key urban and rural settlements identified within levels 1, 2, 3 and 4 of the settlement hierarchy described in Strategic Policy OSS2: Spatial Strategy. Burntwood has been identified as Level 2, which LCP support.</p> <p>However, it is noted that there are no Strategic Housing Allocations in Burntwood, despite it being the second largest settlement in the District behind Lichfield. It is considered that the land known as Blue Hoarded site off Milestone Way presents the opportunity to deliver a high number of new homes for the town, utilising an existing built/urban area, as required by draft Policy OHF1. Initial studies have indicated that the site can deliver approximately 75 homes, as well as some other town centre uses in accordance with its current Town Centre designation.</p> <p>As will be outlined under the representations for draft Local Policy B1, it is not considered that the local market conditions support the continued inclusion of the Blue Hoarded Site to deliver 'retailing' town centre uses. Whilst some town centre uses are acceptable on the site, it is considered that a higher proportion of housing should be supported on the brownfield site than currently envisaged. This would assist the Council in their delivery of the 11,800 homes in the district, building upon existing, built/urban areas in a Level 2 settlement.</p> <p>Recommendation: To recognise the 'Blue Hoarded Site' in Burntwood as a site that can deliver housing in the district.</p>	Support noted. The plan proposes for 400 homes to be built within the urban area at Burntwood, to be identified by the neighbourhood plan or future local plan documents.
LPRPO693	D2 Planning (Laura Wilkinson) on behalf of LCP Limited	Policy B1: Burntwood economy	<p>Firstly, it should be noted that whilst Policy B1 refers to 'two key opportunity sites', these don't appear to have been identified on any plan published as part the Local Plan Review consultation. The two sites may relate to two sites identified in the draft Neighbourhood Plan, clarification would be appreciated.</p> <p>Note that draft Local Policy B1 states that the town centre can include new retail, employment, leisure, residential, health and educational resources. LCP are supportive of the fact that the draft policy includes residential, as it is believed that a mixed development, with residential being the predominate use, would represent the most viable redevelopment proposal for this site particularly given the amount of residential in proximity to the site. We do not identify a quantitative requirement for any additional convenience goods floor space within Lichfield's administrative catchment up to 2031, once existing commitments are taken into account</p> <p>Recommendations Amend the policy so that the Blue Hoarded site can deliver a greater proportion of housing that currently envisaged.</p>	Comments noted. The plan proposes for 400 homes to be built within the urban area at Burntwood, to be identified by the neighbourhood plan or future local plan documents.
LPRPO694	Staffordshire County Council	Policy OSS2: Our spatial strategy	Understanding the scale of proposed growth is fundamental to planning for the likely infrastructure requirements for the District. As a growth level has now been set it should be noted that any significant divergence from this will necessitate a re-think of the infrastructure requirements that could affect the overall strategy.	Comments noted. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review.
LPRPO695	Staffordshire County Council	Policy NS1: New settlement	Offer to assist. No area of search or key considerations that may influence location. New settlement would require own education structure and allow for locations of the new schools and greater opportunity for children to walk and/or cycle to school, encouraging families to be healthy and independent and design out issues that present at start/end of the school day. In relation to the search for a New Settlement it is welcomed that the natural environment will be reflected in the overall design concept.	Comments noted.
LPRPO696	Staffordshire County Council	Policy OR1: Smaller Rural Villages and our wider rural areas	In relation to North of Tamworth should a settlement boundary be applied. Education: These proposed dwellings will impact on a wide range of schools both at primary and secondary level. The requirement for additional education infrastructure will be dependent on the level and location of each of the developments delivered as part of the wider rural area allocation.	Comments noted. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review.
LPRPO697	Staffordshire County Council	Whole document	Policy Map the road and junction improvements marked on the Policy Maps will require revision following completion of the transport evidence base. Historic Environment : Add definition of heritage asset to glossary, split designated and non-designated. Health and Care: HEDNA With regards to the Housing and Economic Development Needs Assessment (HEDNA) – the range of housing cited in paragraph 9.3 is not reflected in the Plan for older people and people with limited mobility. At 9.24 very positive that the needs of people with disabilities are specifically included.	Comments noted regarding Policy Maps, HEDNA and glossary. To be reviewed.
LPRPO698	Staffordshire County Council	Chapter 5: Profile of the District	Para 5.22 the District wide percentage of households within 350m of a half hourly bus service or better is 60% (58% when we provided comments on the Scope, Issues and Options document). Just the city centre figure is now 79%. Request that this data is amended accordingly. Para 5.37 unclear with regard to biodiversity suggest elaborate. Para 5.39 add climate and waste within the paragraph. Para 5.30 the information about the Staffordshire Hoard revise to read 'Hammerwich is the parish where the Anglo Saxon Staffordshire Hoard was discovered in 2009' - its 'home' is now technically in the Birmingham Museum and Art Gallery and the Potteries Museum and Art Gallery.	Comments noted. Wording and data to be reviewed and amended where applicable.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO699	Staffordshire County Council	Chapter 12: Our sustainable transport	Evidence base will need to identify transport mitigation measures that ensure acceptability of the strategic allocations and which will be included in the Lichfield District Integrated Transport Strategy. LTP 2011 is outdated and reference to it should be removed.	Comments noted. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review.
LPRPO700	Staffordshire County Council	Policy SHA1: Strategic housing allocation North of Lichfield	Need to demonstrate that it can be made acceptable in terms of transport connectivity and sustainability. Education: primary level, 3,300 dwellings will require 5FE of provision which would require a 2FE school and a 3FE school. The secondary school on site sits reasonably well when considered against the location of existing schools and located to provide the additional secondary school infrastructure not only from this development but also further housing allocations across Lichfield. Of the 11,800 dwellings proposed around 9,200 are expected to be delivered in parts of the district served by the Lichfield secondary schools. 2FE of additional provision is currently being delivered on two existing secondary school sites following the completion of these projects (expected Sept 2021) between 8FE and 10FE of secondary school infrastructure on a site area of 124,400m2 within this development will be required to mitigate the impact of the revised level of housing proposed through this local plan. All schools on this site would need to be located on appropriate parts of the development to support sustainable travel to and from school and connectivity to settlements outside the city centre. Historic Environment: welcome it will look to preserve or enhance the historic environment and improve our understanding of it. Concern no acknowledgement of scheduled monument.	Comments noted regarding school provision and scheduled monument.
LPRPO701	Staffordshire County Council	SHA2: Strategic housing allocation land west of Fazeley	Need to demonstrate that the proposed housing allocation can be made acceptable in terms of transport connectivity and sustainability. Education: primary education infrastructure of at least 1FE (210 places) will be required. Either through a new 1FE primary school located on an appropriate part of the development site to support sustainable travel to and from school or expansion of a local primary school which has sufficient land to expand from 1FE to 2FE. Detailed feasibility work is required to identify the potential of this proposal, and consultation with the school and governing body will be required. Consideration would also need to be given to the safe and sustainable travel routes from the development site to this nearby existing school. Further analysis is also required to determine whether local schools will be full to capacity, and whether there are any opportunities for a small number of pupils generated by this development, who cannot be accommodated in the new provision of 1FE, to be assimilated into existing school places. Additional secondary school infrastructure will also be required at Tamworth secondary school(s) further work is required to be undertaken. Education contributions would be sought towards additional school places, transport costs and highway improvements. Ecology : the Bourne Brook corridor lies to the south of this site and should be protected and buffered by open space. The use of SUDS treatment trains will be important on this site to protect the brook from pollution and flooding. Health and Care : include reference to the provision of adaptable housing and the need to ensure accessibility of housing, lifetime homes model may be worth referencing.	Comments noted regarding education provision, ecology and reference to adaptable housings.
LPRPO702	Staffordshire County Council	Chapter 14: Our economic growth, enterprise and tourism	Existing shortage of lorry parking in Staffordshire which can cause highway, environmental and anti-social behaviour issues where they persist and this has occurred in and around Fradley. Local Plan should explore the demand and supply for HCV parking within the District and consider the allocation of a HCV parking area if the evidence suggests a need exists. Recommend that any new development which will increase road-based freight should consider where vehicles will park overnight and provide suitable facilities for drivers and their vehicles.	Comments noted.
LPRPO703	Staffordshire County Council	Chapter 11: Our infrastructure	Thresholds provided for primary and secondary education and costs of new schools (including if built to BREEAM excellent) and school transport and site criteria. When considering required transport Infrastructure, the evidence base will need to identify transport mitigation measures that ensure acceptability of the strategic allocations.	Comments noted. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review.
LPRPO704	Laurence Holmes (Lichfields) on behalf of St Philips Lane Ltd)	Policy OSS2: Our spatial strategy	Support the reuse of previously developed land - need to allocate greenfield sites on the edge of existing settlements in appropriate locations that support settlement hierarchy within the plan. Support Fradley status as a L3 settlement. The SPO states that, despite experiencing significant growth over the local plan period to date, there are still significant gaps in infrastructure provision. As a part of the Council's preferred spatial strategy, and directing c.500 dwellings to Fradley, the SPO also includes the proposed Local Policy FR2 (Fradley services and facilities), which supports the delivery of primary health care provision to address the identified local need. Whilst the Council has not prepared an updated Infrastructure Delivery Plan alongside the SPO, the Council's current 'Infrastructure Delivery Plan (March 2018)' [IDP] states that the Primary Care Trust has advised that there is currently no provision within Fradley itself, with residents using facilities at Alrewas and Lichfield. However, in the absence of up-to-date viability work, there is no evidence to demonstrate that the quantum of growth allocated to Fradley could feasibly and viably deliver such infrastructure. St Philips assert the need for the Council to consider whether an uplift to the LHN figure is required to ensure that critical pieces of infrastructure can viably be delivered.. The Council also notes that further growth within Fradley would "accelerate the delivery of essential community and infrastructure assets required to support sustainable growth" (Para 9.16). In this regard, St Philips' site at Fradley could fund new school places, health provision, sports facilities and improvements to the highway network through S106 contributions, therefore further benefiting the wider community.	Comments noted. Policy SHA3 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO705	Laurence Holmes (Lichfields) on behalf of St Philips Lane Ltd)	Policy NS1: New settlement	<p>The Council should reasonably test alternative spatial strategies through the SA process, there is no evidence to suggest that such an approach is necessary within this plan period. Even if the scale of North of Lichfield (Policy SHA1) was to be reduced (which St Philips consider appropriate and necessary), this shortfall in supply could still be met within the District – subject to detailed site testing. Indeed, St Philips’ site could sustainably deliver c.350 dwellings to meet part of this shortfall.</p> <p>This is because the new settlement would have a significant adverse effect on the efficient use of land (SA Objective 4) until the associated infrastructure and services are established (Para 5.4.4). Moreover, a review of the Council’s ‘Strategic housing land availability assessment 2019 (July 2019)’ (“the SHLAA”) indicates that, at present, there is no singular site or package of sites, identified that would be of a suitable scale and in a sustainable location outside of the existing settlement hierarchy which could deliver a standalone new settlement.</p> <p>Taking the above together, St Philips consider that identifying a new settlement within this plan period is unnecessary, as it would not serve to meet the District’s, or GBBCHMA’s, housing needs in this plan period. Fundamentally, St Philips considers that the Council have provided insufficient justification for why such an approach is necessary.</p>	Comments noted
LPRPO706	Laurence Holmes (Lichfields) on behalf of St Philips Lane Ltd)	Policy OHF1: Housing provision	<p>St Philips welcomes the Council’s recognition of the need to consider a higher figure on the basis of employment, infrastructure, affordable housing or unmet housing needs. St Philips are satisfied that the Council has given consideration to whether housing need uplifts to account for economic growth are required. However, the Council’s consideration as to whether an uplift is required is limited only to the issue of economic growth ambitions. In terms of affordable housing need and strategic infrastructure.</p> <p>In terms of unmet housing need it is unclear as to how the Council derived its proposed provision (c.4,500), St Philips consider that the Council’s proposed contribution would appropriately capitalise on the District’s functional housing market relationship with the GBBCHMA. By way of example, the District has a strong degree of migration and commuting linkages within the GBBCHMA (i.e. functional linkages). The District is also in a position to capitalise on its sustainable and direct rail links with Birmingham and is relatively unconstrained when compared to other authorities within the GBBCHMA. In essence, St Philips support the Council’s approach to addressing this crucial cross-boundary matter.</p> <p>In practice, this means ensuring a housing trajectory has sufficient land supply across the plan period so that it can adjust and accommodate any unforeseen circumstances, such as a degree of flexibility in delivery rates and densities. Critically, this means that to achieve a housing requirement a Local Plan must release sufficient land, or allow sufficient headroom so that there is an appropriate buffer within the overall planned supply.</p> <p>At present, the Council’s proposed growth strategy would not sufficiently meet the Council’s identified c.11,800-dwelling housing requirement. It also does not allow for any flexibility to respond to changing circumstances. If any single component of supply does not come forward or if, for example, the North of Lichfield strategic site falls behind the timescales implied by the Council, the housing figure is unlikely to be fulfilled and the housing needs will not be met.</p> <p>As such, it is necessary for the Council to identify additional suitable land supply (i.e. more than needed to meet the housing requirement) to ensure that there is the flexibility to respond to failures to deliver the required dwellings in the allotted time frames and across the whole plan period. In essence, it is strongly recommended that greater flexibility be built into the Local Plan Review. It is best practice to incorporate a 10% headroom in to the supply, and to this end, St Philips recommends that a 10% headroom should be included in the Local Plan Review</p>	<p>Comments noted. Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review.</p> <p>The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period.</p>
LPRPO707	Laurence Holmes (Lichfields) on behalf of St Philips Lane Ltd)	Policy ONR1: Green Belt	<p>Strategic Policy ONR1 (Green Belt) of the SPO sets out the Green Belt policy for the District.</p> <p>Broadly, the policy mirrors the NPPF policies on the matter, however, it also seeks to designate ‘new’ Green Belt to the north of Lichfield.</p> <p>When establishing ‘new’ Green Belt, paragraph 135 of the NPPF is clear that this can only be done in exceptional circumstances. It goes on to state that this could be done when planning for larger-scale development such as new settlements or major urban extensions, and sets out criteria against which the exceptional circumstances should be assessed.</p> <p>In this regard, the only evidence proffered by the Council to support the designation of new Green Belt is set out in the explanatory text for Policy ONR1. Notably, the GB Review acknowledges the tests set out in paragraph 135 (Para 2.10); however, it does not appear to include any consideration of these requisite tests needed to demonstrate the inclusion of land north of Lichfield within the Green Belt</p>	Comments noted. Green Belt Review 2019 makes clear that ‘exceptional circumstances’ would need to be demonstrated if changes to the Green Belt boundary are proposed. This has been judged to be the case in the preferred options document as stated at paragraph 16.5 in terms of meeting development needs and the identification of new Green Belt to the north of Lichfield City.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO708	Laurence Holmes (Lichfields) on behalf of St Philips Lane Ltd)	Policy SHA1: Strategic housing allocation North of Lichfield	<p>St Philips acknowledge the appropriateness of directing a proportion of growth to the largest, and most sustainable settlement within the District, there is a fundamental concern regarding the scale of development currently envisaged by the Council in that location.</p> <p>It is noted that the SPO does not include a housing trajectory. It is therefore difficult to establish what the Council's/Developer's assumed lead-in times and build-out rates for the c.3,300 dwelling site are. In the absence of evidence, it is assumed that the Council can demonstrate that the site would be fully delivered within the Local Plan Review period (2018-2040).</p> <p>In this regard, the SPO states that a masterplan for the site will be required that will need to address design and infrastructure requirements set out in Strategic Policy SHA1. At this stage, there is no timescale indicated for the production of this, or the subsequent outline and reserved matters applications (and discharging of conditions) required prior to commencement of significant opening up infrastructure works.</p> <p>On the basis of the above, the Council should reconsider the quantum of development allocated to Lichfield. This would not markedly detract from the Council's preferred spatial strategy per se but would reduce the scale of development and therefore the negative implications of coalescence.</p>	Comments noted
LPRPO709	Laurence Holmes (Lichfields) on behalf of St Philips Lane Ltd)	Policy SHA3: Strategic housing allocation land north and south of Hay End Lane, Fradley	<p>In selecting the preferred site allocations, the SA states that its initial findings informed the stage 4 detailed assessment of sites undertaken in the Council's 'Housing Site Selection Paper (September 2019)' [HSSP] (Para 4.3.5). Following the initial findings of the HSSP, the SA assessed 304 sites against the SA Objectives. The HSSP/SA concluded that four preferred strategic allocations were considered to be most appropriate in meeting the preferred growth strategy and emerging distribution of growth within the plan.</p> <p>Notwithstanding this, by virtue of the lack of commentary on the SA scoring, it is fundamentally unclear as to why the Council has scored St Philips' site lower than the Land north & South Hay End Lane, Fradley. By way of example, on the three areas the SA scored lower, St Philips notes the following:</p> <p>1 The efficient use of land: It is considered that this element is unlikely to comprise greater than c.15% of the total hectare of the overall site. In this regard, it should be noted that similarly, St Philips' site contains several farm buildings within the boundaries of the site, which would also not exceed c.15% of the total hectare of the overall site. As such, St Philips consider that the Council should amend the scoring of Land at Fradley Lane, Fradley to a 'minor negative' to reflect this point; and</p> <p>2 Biodiversity: In its assessment against the biodiversity SA objective (Objective 11), the Council's SA scored St Philips' site with a 'minor negative' for protecting priority habitats and local nature conservation sites and its potential impact on statutory designated sites. Again, by virtue of the lack of commentary on the scoring/site assessments, it is difficult to establish the Council's reasoning and justification for this.</p> <p>Notwithstanding the above, St Philips welcomes the Council's commitment to undertake a 'review of preferred sites following consultation' (Stage 6) as a part of the HSSP. The Council states that the preferred sites will be reviewed against, inter alia, consultation responses received, updated technical information (such as infrastructure requirements) and the outcomes from the viability study (Para 3.25, HSSP).</p> <p>At present, it is unclear as to how the Council can consider its preferred strategic allocation in Fradley robust, as no evidence has been provided to demonstrate whether the number of dwellings allocated (c.500 dwellings) would be sufficient to fund the identified infrastructure; it is particularly clear that key, and crucial, evidence-based documents necessary to underpin all site allocations have not been finalised.</p>	Comments noted. Policy SHA3 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO710	Staffordshire County Council	Policy F2: Fazeley services and facilities	Existing primary school in the village is 1.5FE (315 places) and is currently full, this is being expanded to its full potential of 2FE (420 places) to address some of the need for the existing commitments. In addition, a new 1FE (210) primary school is proposed to be delivered in September 2022, there is currently sufficient land to expand this 1FE primary school by 0.5FE (105 places) to a 1.5FE (315 places) primary school but insufficient land at either school site currently prevents any further expansion.	Comments noted related to education provision in Fazeley.
LPRPO711	Staffordshire County Council	Policy SHA3: Strategic housing allocation land north and south of Hay End Lane, Fradley	Further reflection of the proposed scale of growth in this location is required to address the impact on education infrastructure as there is no obvious option to expand existing schools to address this increase and an additional school would have spare places. Secondary school infrastructure is included in the Lichfield City comments. The canal corridor is a Local Wildlife Site and is already deteriorating due to eutrophication from dog walking. Any additional development should provide a wider corridor that disperses effects of public access, which could include new wildlife planting and also strengthen the wildlife corridor. Historic Environment: no mention is made of the Scheduled Neolithic Causewayed Enclosure (a nationally designated heritage asset) which is located immediately adjacent to the north of this allocation site. Great care will need to be taken to deliver a development which will respect and enhance the setting and significance of this heritage, Historic England should be consulted. A search of the HER shows the presence of a number of below ground features which are likely to relate to the aforementioned causewayed enclosure within the wider allocation site, appropriate assessment, evaluation and mitigation, as specified in the NPPF, will be required.	Comments noted on education provision, wildlife site and historic environment related to SHA3.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO712	Staffordshire County Council	Policy SHA4: Strategic housing allocation land of Huddlesford Lane	The development would be expected to contribute financially to the delivery of additional primary school infrastructure in the local area to mitigate its impact. Secondary school infrastructure is included in the Lichfield City comments.	Comments noted regarding education provision.
LPRPO713	Staffordshire County Council	Chapter 19: Burntwood	The requirement for additional primary school places in the area will be dependent on where the 400 dwellings are proposed within the area and whether they are delivered as one large development, or a number of smaller developments spread across the town. The secondary schools in the area are full and additional infrastructure may be required dependent on the location and timing of future development in this location.	Comments noted regarding education provision.
LPRPO714	Staffordshire County Council	Chapter 20: Larger service villages	Primary level there is limited capacity within the two village primary schools for any growth in pupil numbers at Armitage with Handsacre. The Hart School is full and contributions towards additional secondary school infrastructure will therefore be required. Ecology: welcomed that there are opportunities to deliver improvements to the Trent and Mersey Canal Conservation Area, this is also a Local Wildlife Site. Historic Environment : welcomed that it is recognised there are opportunities to deliver improvements to the Trent and Mersey Canal Conservation Area and to enhance the setting of the Scheduled Monument. Health and Care : include reference to the provision of adaptable housing and the need to ensure accessibility of housing, lifetime homes model may be worth referencing.	Comments noted relating to infrastructure in larger service villages.
LPRPO715	Staffordshire County Council	Policy S1: Shenstone environment, services and facilities	Existing primary school in the village is 1FE and is full to capacity. The provision for 153 dwellings within the village will put additional pressure on primary school places at this school and in the other local schools. Any development in this location would be expected to contribute financially to the delivery of additional primary school infrastructure in the local area to mitigate its impact. Additional secondary school infrastructure will be required in Lichfield to meet the needs of both the committed development and the proposed. This need forms part of the 8-10FE required to mitigate the total number of dwellings in the local plan.	Comments noted relating to education provision for Shenstone.
LPRPO716	Staffordshire County Council	Chapter 8: Strategic objectives & priorities	SO & P1 unclear and could require developments to demonstrate how combination of smart technology, demand management, and renewable energy supply will deliver self sufficient energy demand and supply. SO & P3 unclear on impact on climate change. SO 7 P5 no mention of the canal network. SO 7 P13 some replication of SO & P3.	Comments noted relating to Strategic Objectives and Priorities.
LPRPO717	Staffordshire County Council	Policy OSC1: Securing sustainable development	Point 'mitigate and adapt to the adverse effects of climate change.' suggest reword of bullet point to strengthen flood risk. point "Conserve, enhance or expand natural, built and heritage assets and their settings and improve our understanding of them wherever possible" delete 'wherever possible". This is an equal pillar of sustainable development and none of the other bullets contain such caveats. Should include taking account of districts environmental characteristics. Para 10.10 should be 'waste disposal authority' Should include waste collection in the accessibility and design for developments.	Comments noted relating to amended wording, wording to be reviewed.
LPRPO718	Staffordshire County Council	Policy OSC2: Renewables and Low Carbon Energy	There is a heavy burden on the applicant of any renewable energy project to demonstrate the need and benefit for the scheme. Suggest wording of this policy be revisited following completion of study to provide more encouragement to schemes in 'appropriate' locations. Criteria do not appear to take account of newer renewable technologies which are far more sensitive to aesthetics, which appears to be of importance in this policy, such as solar panels which look like roof slates. Restrictions in the policy do not demonstrate they take account of climate change in line with SO 3 and 13 and should include contribution to Green House gas emissions and impact on the local economy.	Comments noted relating to Policy OSC2.
LPRPO719	Staffordshire County Council	Policy OSC4: High Quality Design	Para 10.27 the recognition of the importance of trees and hedges is welcomed. It may be helpful to include policies about the importance of formal tree planting in new development with targets, and the replacement of trees on a two/three to one basis where these are inevitably lost.	Comments noted.
LPRPO720	Staffordshire County Council	Chapter 10: Our sustainable communities	OSC5 suggested alteration to wording.	Comments noted wording to be reviewed.
LPRPO721	Staffordshire County Council	Chapter 17: Our built and historic environment	Generally supportive. Welcome update of Landscape Character Assessment. Support update to HECA.	Support noted.
LPRPO722	Staffordshire County Council	Chapter 15: Our healthy & safe communities	Plan should strive to increase the levels of physical activity and the public rights of way network should be integral to any schemes. Any development needs to take appropriate mitigation to ensure the public path network is protected and improved especially where housing development is likely to lead to a rise in usage of the network in the vicinity of the development.	Comments noted.
LPRPO723	Staffordshire County Council	Chapter 13: Our Homes	Policy OHF2 recommend consider specialist housing (care homes and extra care) as part of a wider range of housing that keeps people independent and out of care including lifetime homes and adaptable homes as well as sheltered and age appropriate housing.	Comments noted.
LPRPO724	Staffordshire County Council	Chapter 12: Our Sustainable transport	Provision aims to reduce the level of car trips generated from development, however, the policy needs to recognise that residual traffic generation will require additional highway capacity in the form of traffic management and junction improvements.	Comments noted. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review.
LPRPO725	C Buchanon (First City) for Mrs Mears and Mr KB Jackson	Whole document	Do not consider it appropriate to defer decisions regarding large numbers of housing and allocation of sites to Neighbourhood Plans, the next LPR or post plan period. Consider SOCG right approach to agreeing a meaningful and proactive strategy to deliver the necessary housing which has a cross boundary impact. Should be further details of how a SoCG will work alongside the strategy for Burntwood.	Comments noted. Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO726	C Buchanan (First City) for Mrs Mears and Mr KB Jackson	Chapter 3: National Context & Chapter 4: Local Context	Consider imperative sites be included around edge of Burntwood and not left for allocation in Neighbourhood plans as this will cause delay. Disagree with the lack of allocations for Level 2 other main settlement. Important to know what recourse the Council have if Town Council do not wish to review their Neighbourhood Plan and align with LPR. Site south of Highfields Road is a sustainable site.	Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed. Town Council have not indicated that they disagree with the Strategy. Town Council have prepared a Neighbourhood a Plan and are required to review it in 5 years.
LPRPO727	C Buchanan (First City) for Mrs Mears and Mr KB Jackson	Policy NS1: New settlement	Consider it would be more sustainable to identify land on the edge of existing settlements, especially larger settlements such as Burntwood and the land south of Highfields Road which is located in close proximity to existing infrastructure, service and facilities that can be utilities improved and expanded on where necessary. Urban extensions in already sustainable settlements would allow for significantly less land being removed from the Green Belt.	Comments noted. Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO728	C Buchanan (First City) for Mrs Mears and Mr KB Jackson	Policy ONR1: Green Belt	Do not support how non-strategic changes to the Green Belt are proposed to be undertaken. Do not consider 400 is sufficient for Burntwood. Whittington has an allocation of 75 which is considered strategic and yet Burntwood has an allocation of 400 which is not considered strategic consider greater detail required to explain decision making. Consider amendments to the Green Belt should take place through the Local Plan. More justification required as to why Coulter Lane has been chosen for ADR above other sites on the edge of Burntwood. Consider score of B8 is inconsistent with supplemental GB review Nov 2016. Reference made to new settlement, consider more sustainable for sites on edge of existing settlements to be reviewed in the first instance.	Comments noted. A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO729	C Buchanan (First City) for Mrs Mears and Mr KB Jackson	Policy OHF1: Housing Provision	Consider it would be appropriate for the Council to provide additional explanation on their definition of a strategic allocation as there seems to be varying extremes in regards to the size of strategic sites proposed. Do not consider approach for Burntwood is most effective way of delivering necessary housing required. Local Plan Review should play a more proactive role in the allocation of sites to ensure delivery during the plan period. The Neighbourhood Plan is not the most appropriate strategy to actively deliver on the housing needs of Burntwood. Have assessed remaining sites and do not consider there is sufficient land within the urban area to support the necessary residential development in the most appropriate locations to ensure a functioning, cohesive, thriving settlement. As indicated by completions in recent years, no strategic allocations have not delivered high numbers. Brownfield is not always best used for residential. Consider delivery of housing should be the main goal when allocating sites and site being promoted south of Highfields Road with national housebuilder who is committed to deliver completions.	Comments noted. A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO730	C Buchanan (First City) for Mrs Mears and Mr KB Jackson	Chapter 19: Burntwood	Consider the benefits of an allocated sites have been overlooked. New development on the edge of the settlement will allow future development on sites in the central urban areas to be dedicated to employment and retail related uses ensuring viability of Burntwood.	Comments noted.
LPRPO731	C Buchanan (First City) for Mrs Mears and Mr KB Jackson	Policy OSS2: Our spatial strategy	Pleased to see that the Local Council are committed to contributing to the wider Housing Market Area in addition to the needs of the District. However consider further evidence is required setting out how this figure was reached and what cooperation has been had with neighbouring authorities. No housing allocations have been identified within this proposed policy for Burntwood consider this is inappropriate for the second largest settlement in the District and for a plan period spanning 22 years. Lichfield City, Fradley, Fazeley and Whittington have all been identified as receiving Strategic allocations but Burntwood has not. All of these settlement, bar Lichfield City, are of a smaller size than Burntwood. There is no justification within the document as to the reason a Level 2- Other Main Centre settlement has no allocations in the proposed Local Plan Review. Not allocating is contrary to the sustainability goals. Housing developments and the new residents will have a positive economic impact and will help to attract retail operators into the town. Consider allocation of land south of Highfields Road (which is in private ownership and not public open space or recreation land) is sustainably located to provide the needs of Burntwood without having a negative impact on the wider area. Sites should be assessed on more than Green Belt grounds alone to ensure that the most appropriate, sustainable and deliverable sites come forward.	Comments noted. Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review. The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period. A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO732	D Oakley (RPS Group) for Fradley Consortium	Policy OSS2: Our spatial strategy	RPS is broadly supportive of the Council's aspiration for growth and to promote development that enhances local communities in the District, however the use of a minimum need figure does not properly support the pursuit of such an objective and could in fact be counterproductive in this regard. RPS suggests that there is justification for a housing requirement for Lichfield that exceeds the minimum figure 7,282 dwellings. HEDNA advises at para 7.44 that, '... the Council could be justified in increasing overall housing delivery to ensure the affordable housing need is met as best as possible. The Council accepts that the need for affordable housing is 'significant' in the District or circa 80% of overall need (paragraph 13.23 of the LDLP refers) and total need will remain unmet. Suggest that sites that are either in part or wholly brownfield, and which are available and suitable for development (in particular Land at Fradley Junction) should be carefully considered given that the Council cannot rely wholly on brownfield to the housing needs of the District. Not made clear in the spatial strategy what contingencies are to be established to address the potential situation whereby certain neighbourhood plan areas either do not, or are unable to, allocate sufficient sites to meet the local housing need or housing requirements in the LDLP.	Comments noted. Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review.

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LPRPO733	D Oakley (RPS Group) for Fradley Consortium	Policy OHF1: Housing provision	<p>The overall housing provision accommodated in the LDLPR (11,568) is slightly less than the preferred housing requirement (11,782). LDLP therefore makes no contingency or allowance for non-implementation in the identified supply and lacks sufficient flexibility and the trajectory lacks clarity beyond 2029. Suggest non-implementation rate of 10% which gives a shortfall of 2,242. Site selection paper not credible as it doesn't set out why sites have been discounted and justify these reasons and why the chosen 4 sites are the most appropriate. The Council is potentially seeking to apply the findings of the SA (a process that is separate to the site selection exercise) at multiple points in the selection process, contrary to the site selection methodology (figure 1 of the paper refers). None of the other 'factors' highlighted above have been properly explained in the paper and so it is unclear what impact these factors have had, or not had, on the selection and rejection of sites. Therefore, it is unclear how the SA and the RAG assessment has informed the Council's preference for those sites set out in Table 2 of the paper. The intention of the LDLP to focus growth at Fradley settlement, in line with its status in the settlement hierarchy at Policy OSS2, is broadly welcomed RPS has concerns that the preferred choice of sites at Fradley is not soundly-based especially regarding flood risk and previously developed land. The SFRA1 (paragraph 10.4.1 refers) also recommends that an SFRA Level 2 exercise is considered however, the Council has not undertaken any 'further work' RPS suggests that there are more appropriate sites for allocation at Fradley that are more sequentially-preferable, in particular the land at Fradley Junction (SHLAA site 250), which is located outside Flood Zone 2 and 3a/3b that should be considered more favourably at the next stages of the LDLP process. Consider that the Land at Fradley Junction constitutes a 'partial brownfield site' whose inclusion as an allocation would clearly be consistent with the spatial strategy and strategic housing policies.</p>	<p>Comments noted. A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.</p>
LPRPO734	D Oakley (RPS Group) for Fradley Consortium	Policy ONR1: Green Belt	<p>Concerns with the Council's justification for proposing amendments to the Green Belt boundary. Unmet housing need will not, of itself, provide the exceptional circumstances required to remove land from the Green Belt. Consider other reasonable non-Green Belt options exist to accommodate growth requirements in particular client's Land at Fradley Junction.</p>	<p>Comments noted. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.</p> <p>Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.</p>
LPRPO735	Janet Hodson (JVH) on behalf of Mrs Wiseman	Policy OSS2: Our spatial strategy	<p>Object to the Spatial Strategy as drafted in the Plan. The four identified locations are strategic locations for growth with large sites at Lichfield Fradley and Fazeley. Do not consider that a growth strategy that relies heavily on three large strategic sites will deliver homes within a reasonable timescale given the infrastructure requirements for such large sites and that a Strategy that includes smaller and medium sized allocations would be a more reliable vehicle for the delivery of new homes.</p> <p>The strategic location north of Lichfield conjoins Lichfield City with Fradley leading to a conurbation effect, Fradley cannot realistically be regarded as a separate settlement but merely a suburb of Lichfield. The so-called gap between the edge of the strategic housing allocation and the Fradley employment area is approx. 65 metres wide. This is not separation in any meaningful sense of the word.</p> <p>The Policy sets out that sustainable extensions to existing settlements will be promoted through the District, but it is not clear if these are just at the 4 locations that are denoted or if other extensions to settlements are proposed. The Policy as drafted is unclear on this matter.</p> <p>Do not consider that the site selection methodology is robust in its analysis of sites, and their agricultural land classification. Weighting system that is finally used to determine the allocated sites is not transparent.</p>	<p>Comments noted. The Preferred Options document sets the spatial distribution of growth, including strategic housing allocations and housing requirements for settlements and levels of the settlement hierarchy. The document includes smaller existing allocations as set out at Appendix A of the preferred options document. The preferred options includes a proposal to identify new Green Belt to the north of Lichfield City within the gap between Lichfield and Fradley.</p> <p>Site Selection Paper</p>
LPRPO736	Janet Hodson (JVH) on behalf of Mrs Wiseman	Policy NS1: New settlement	<p>Does not agree that a new settlement is the right approach to new growth in the future. If such a policy remains in the Plan then this will pre judge the growth strategy for a future plan review, when circumstances will potentially be very different to the current situation.</p> <p>New settlements require significant forward investment and it is considered unlikely that this will be a viable and deliverable solution. The alignment of a new settlement to existing road transport corridors and out of the green belt is unlikely to be the most sustainable way to accommodate new growth and development.</p>	<p>Comments noted</p>

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LPRPO737	Janet Hodson (JVH) on behalf of Mrs Wiseman	Policy OHF1: Housing provision	<p>Does not consider that the Whittington allocation for 75 new homes is indeed a strategic allocation, and compared to the other three allocations is effectively only a small site.</p> <p>Appears from policy that housing needs are to be met by both the strategic allocations and land within the settlements in the hierarchy, although this is not clearly set out as to how much development is to be found outside of the strategic allocations. Policy needs to be more clearly set out, rather than having to rely on further sections of the plan to establish where the remaining housing numbers are coming from.</p> <p>Policy sets out that outside of identified locations there will be no development other than infill within defined boundaries, conversions, rural exceptions and Neighbourhood Plan sites. Plan should set out that small scale development adjacent to lower order settlements can be acceptable where it is sustainable and meets a housing need.</p> <p>Table 13.1 presents the distribution of new housing, however there are no totals on the table and the overall housing allocation in column 1 adds up to 11,568 rather than 11,800 as stated in the following text.</p> <p>The second column of the table is really commitments and should be split between actual allocations and sites with planning permission for a clear understanding of the Plan. The third column's adds to 5,345 dwellings to be allocated in this plan with some of this requirement being left to neighbourhood plans.</p> <p>Consider that this Plan should allocate sites in Armitage, Fazeley, Shenstone and the wider rural area rather than leave these to Neighbourhood Planning. If alterations to the green belt are required it should be for the District Plan to deal with these questions through an overview.</p> <p>Specifically object to the large urban extension at Fazeley of 800 units. Other more appropriated sites have not been allocated at this settlement which are deliverable in a shorter timescale and are of a size that make then attractive to a wide variety of housebuilders.</p>	<p>Comments noted. Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.</p> <p>A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.</p>
LPRPO738	Janet Hodson (JVH) on behalf of Mrs Wiseman	Policy OHF4: Affordable housing	<p>Policy appears to be saying that every single housing site will be required to deliver affordable housing, there is no threshold indicated in the Policy for affordable housing to be required. NPPF sets out that affordable housing should not be required on sites of less than 10 dwellings (major developments) If this is what the Policy means it should say so.</p> <p>Not clear at the time of writing what the percentage of affordable homes will be required and further input will be made on this in the future. Do not consider that conversions should be included in the affordable calculations and particularly of historic /Listed Buildings. Where the conversions costs are significant, and where the imperative in that situation is the preservation and future use of a Heritage Asset.</p> <p>Council need to take a more flexible approach to the delivery of affordable homes on some sites, especially in the rural areas , where often the approved housing associations are reluctant to take properties in small numbers or some locations. More thought needs to be given to the mix required in S 106 agreements and to have some inbuilt flexibility, rather than a rigid prescription. Do not consider the present arrangements to be at all satisfactory.</p> <p>The process and methodology for off site contributions should be carefully thought through, at the present it is an SPD and this is a document not properly tested through the development plan.</p>	<p>Comments noted. Evidence within the HEDNA suggests the Council will be justified in seeking to achieve as much affordable housing as viably possible on appropriate development sites. Further viability evidence is being collected which will inform the policy and provide a clear position in terms of the appropriate level of affordable housing to be sought.</p>
LPRPO739	Janet Hodson (JVH) on behalf of Mrs Wiseman	Policy ONR1: Green Belt	<p>Support the concept of changes to the Green Belt to accommodate new housing growth in sustainable locations.</p>	<p>Support noted.</p>
LPRPO740	Janet Hodson (JVH) on behalf of Mrs Wiseman	Chapter 20: Larger Service Villages & Our Vision for Shenstone	<p>Objects to the Vision for Shenstone and the requirement to allocate at least 100 dwellings as part of the Neighbourhood Plan process instead the process should be a strategic decision made in the Local Plan. The Plan should remove land from the green belt to accommodate the proposed development as a strategic site allocation. Given the size of allocations in other Villages such as Whittington, an allocation of 100 units is large enough to be strategic.</p> <p>There should not be a squeezing of the previously developed land on the Lynn Lane Industrial Estate. This economic area is crucial to the sustainability of the settlement and should not be regraded an easy hit to accommodate new homes rather than take land out of the green belt on the periphery of the settlement.</p> <p>Site S1 as identified in the Green Belt Study is a modest extension, part of the east of Court Drive Road would create a development commensurate with the size of the settlement, which can provide an area of growth without compromising the green belt purposes. The site is well contained by the existing built form and does not protrude the settlement out in to the wider countryside The land should be recognised either as an allocation or at least as safeguarded for the future. The alteration to the green belt should not be delayed to a Neighbourhood Plan. The site selection methodology for this site indicates only one "red " for this site as being within the green belt.</p>	<p>Comments noted. Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.</p>

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LPRPO741	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	Policy OSS2: Our spatial strategy	<p>The pro-active approach taken to providing a contribution of dwellings towards the GBBCHMA shortfall is welcomed however, it is not clear how the figure of 4,500 dwellings has been identified. It is acknowledged that there is a separate draft policy regarding a new settlement and this is commented on separately. However, it should be clarified in SP OSS2 how the figure of 4,500 dwellings has been derived and what evidence this is based on as this does not appear to have been explained.</p> <p>South Staffordshire District Council is proposing to test a contribution of 4,000 dwellings based upon the minimum levels of growth implied by the strategic areas of search identified within the District in the Strategic Growth Study. The 4,000 dwellings figure has been calculated on the basis that it provides a minimum contribution on respect of all recommended areas of search identified with the Strategic Growth Study (2 x 1,500 dwelling SUE + 2 x 500 dwelling proportionate dispersal locations). South Staffordshire District Council considers this provides certainty to other LPAs within the GBBCHMA that the Council is testing its recommended capacity to accommodate additional growth based upon a consistent HMA-wide evidence base.</p> <p>It is suggested, therefore, that references to specific allocations should be removed from this policy and Table 3.1 Overall Distribution of New Homes should be included in place of this as this sets out where growth will be directed (which will enable the inclusion of a range of sites of different types and sizes, in compliance with NPPF paragraphs 67 and 68) rather than simply listing where larger allocations will be made. Further comments are provided on this table under representations relating to Strategic Policy OFH1: Housing Provision.</p>	Comments noted. The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period.
LPRPO742	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	Policy NS1: New Settlement	<p>It is acknowledged that in accordance with the Strategic Growth Study Lichfield District Council has indicated its support for a new settlement of around 10,000 dwellings within the District. It is agreed that any new settlement would not deliver homes within the next 15 years and therefore cannot be relied upon as a potential source of supply in this Plan. The supporting text acknowledges that a new settlement is a significant undertaking which will take a number of decades to plan for and complete. The infrastructure requirements for a new settlement will be a significant task which will require significant time input. The Strategic Growth Study acknowledged that there is a significant leading time to delivery of large strategic development sites.</p>	Comments noted
LPRPO743	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	Policy OHF1: Housing provision	<p>There are four strategic development allocations/areas listed in the policy alongside the approximate number of new homes they will deliver. It is not clear how the proposed allocations relate to the spatial strategy policy and settlement hierarchy and the approach seems rather 'ad hoc' and is not explained. Additionally, there is no reasoning which sets out the inconsistency with the current adopted spatial strategy. The proposed levels of growth vary significantly between settlements, including those at the same level in the settlement hierarchy. It is not clear how the spatial strategy has led to this and this needs to be demonstrated and justified, It is not clear how the term 'strategic allocations' has been defined. This is of particular importance as the Council is currently proposing that non-strategic allocations will be made through Neighbourhood Plans. The range of proposed strategic allocations spans from 75 - 3,300 dwellings. It needs to be clarified what the maximum threshold for a non-strategic allocation would be with reference to the proposed strategic allocations.</p> <p>The approach of leaving the allocation of 'non-strategic' sites to Neighbourhood Plans is not supported. This approach is not consistent with national policy which requires Local Plans to identify specific deliverable sites for years 1-5 and specific, developable sites or broad locations for growth for years 6-10 and where possible for years 11-15 of the plan.</p> <p>The Local Plan should include alternative provisions should the progress (including review) of any Neighbourhood Plan stall. The Local Plan should set out a timeline for Neighbourhood Plan progress including a date by which allocations need to have been identified.</p> <p>The Local Plan is also required to provide certainty on where growth will be delivered in order to ensure alignment of infrastructure delivery. This needs broad locations of growth to be identified so that infrastructure needs can be planned for. This should be via an updated Infrastructure Delivery Plan or equivalent document.</p> <p>The current strategy is heavily reliant on a large site to deliver this however this is not supported by detailed evidence to show that work has progressed sufficiently to demonstrate deliverability of these during the plan period.</p>	<p>Comments noted. Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.</p> <p>Policy SHA1 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.</p>

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPR744	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	Policy OHF2: Providing a balanced housing market and optimising housing density	<p>Touch Developments is concerned that in its current form this policy, by referring to specific percentage figures, the plan lacks sufficient flexibility to meet changing housing needs across the District and across the plan period.</p> <p>It is acknowledged that the Council has produced a Housing and Economic Development Needs Assessment (HEDNA) which does consider housing needs and could be referred to in this policy. This should be clarified and explained further in the document and clearly referenced and explained in the plan. In seeking to specify a mix, the policy lacks flexibility to reflect differences across the sub-market areas; changing needs over the plan period and site-specific considerations which will often influence the mix that can be delivered on individual sites.</p> <p>The policy also sets out minimum net density of 35 dwellings per hectare. This is considered to be broadly appropriate. Developments in Lichfield City, Burntwood Town and locations with good public transport links will be expected to achieve higher densities of approximately 50 dwellings per hectare. It is questioned if this is actually achievable, or indeed appropriate on many sites in Lichfield and Burntwood, particularly those outside of the centres where regard should also be had to context and setting.</p>	Comments noted. Proposed policy OHF2 seeks to deliver a mix of dwellings to meet the needs of the District's demographic including provision of starter and affordable homes and smaller homes. Evidence in relation to viability and the level of a affordable homes to be required is being collected.
LPRPO745	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	Policy OHF4: Affordable Housing	As presently drafted, this policy does not yet set an affordable housing rate and instead seeks affordable housing on each housing development to the highest level viably possible. The supporting text clarifies that at time of writing the Council apply a rate of 35% which is currently viable, against a policy target of 40%. The lack of a specific affordable housing threshold in the policy does not accord with either the NPPF or the Viability and Plan Making Planning Practice Guidance (PPG). This should be subject to viability testing to confirm an appropriate figure. The initial viability evidence indicated that 0%, 20%, 30% and 40% would be tested on major development sites. This evidence has determined that a figure of 40% is unlikely to be viable. The policy also seeks to allow flexibility in the tenure, size and type of affordable housing on a scheme by scheme basis. This flexibility is supported and should be delivered with reference to the most up-to-date Strategic Housing Market Assessment (SHMA).	Comments noted. Evidence within the HEDNA suggests the Council will be justified in seeking to achieve as much affordable housing as viably possible on appropriate development sites. Further viability evidence is being collected which will inform the policy and provide a clear position in terms of the appropriate level of affordable housing to be sought.
LPRPO746	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	Policy OEE1: Our employment and economic development	This policy states that approximately 61 hectares of land will be allocated for employment use in accordance with the Housing and Economic Development Needs Assessment 2019. It is not clear why the current consultation document has not identified any employment sites and it should be clarified how the Council intends to deliver its employment land needs.	Comments noted. Existing allocated employment areas are identified on the policies maps which accompanied the Preferred Options document. Current evidence suggests there are limited additional options for locating employment growth, this is explicitly referred to within the consultation document.
LPRPO747	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	Policy ONR1: Green Belt	<p>As currently drafted, the policy covers both strategic and development management matters related to Green Belt. The development management matters are addressed by reference to national Green Belt policy however the wording should amended to comply with national policy. It is suggested it would be clearer to separate strategic and development management concerns into separate policies.</p> <p>In terms of the strategic approach to the Green Belt there is an acceptance that there needs to be changes to the Green Belt boundary to accommodate growth requirements at Whittington and Fazeley. Green Belt release needs to be made to deliver a sustainable spatial strategy as per our previous comments on this. The recognition of the need to release Green Belt is welcomed and it is clear that the Council has started to produce the exceptional circumstances justification for such a release but this needs to be supported by further evidence.</p> <p>For the proposed new Green Belt between Lichfield city and Fradley it needs to be clearly demonstrated that this meets the above tests.</p>	Comments noted. Green Belt Review 2019 makes clear that 'exceptional circumstances' would need to be demonstrated if changes to the Green Belt boundary are proposed. This has been judged to be the case in the preferred options document as stated at paragraph 16.5 in terms of meeting development needs and the identification of new Green Belt to the north of Lichfield City.
LPRPO748	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	Chapter 16: Our Natural Resources	The approach to habitats and biodiversity is generally supported where it is consistent with national policy. Policy ONR5 addresses natural and historic landscape. It is contended that Green Belt is not a landscape designation and is not a 'valued' landscape1. It is therefore not clear why this policy makes reference to the Green Belt and should focus on the AONB and its immediate surroundings. Any policy text regarding beneficial use of the Green Belt should logically be included in the Green Belt policy.	Comments noted

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO749	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	Policy SHA1: Strategic housing allocation North of Lichfield	<p>This allocation proposes 3,300 new dwellings on land between two existing housing allocations; Land North East of Watery Lane, Curborough and Land at Streethay. Development has started on the Streethay allocation however has not commenced on the Watery Lane site. Given the current situation with the applications to facilitate the first phase of development, there are concerns regarding delivery.</p> <p>There is a lack of evidence either in the Plan or in the supporting evidence base that the local infrastructure can be viably upgraded.</p> <p>This allocation aims to deliver 3,300 dwellings in a single location. This equates to 70% of the total dwellings allocated in this Plan. For the reasons outlined above, it is questionable if this allocation will be able to deliver this number of units in this location.</p>	<p>Comments noted. Policy SHA1 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.</p>
LPRPO750	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	Policy INF1: Delivering our Infrastructure	<p>There needs to be additional evidence published in support of the Local Plan Review regarding infrastructure in order to provide clarity over what additional infrastructure is required to support the Local Plan Review allocations and how this will be delivered. This should include an update to the Infrastructure Delivery Plan (IDP) and further consultation with the County Council and other relevant consultees on matters such as highways modelling and education provision. The approach to sustainable transport set out in the policies in this section is broadly supported. However, the requirement for all major development proposals to produce a travel plan is too onerous for smaller developments. This threshold should be revised to a higher level. It is noted that parking provision will continue to be determined with reference to the Sustainable Development Supplementary Planning Document (SPD). This is not in line with national policy, must be addressed.</p>	<p>Comments noted. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.</p>
LPRPO751	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	Chapter 7: Our Vision	<p>It is noted that Vision remains broadly the same as that presented in the adopted Local Plan Strategy. It is considered that it remains relevant and is broadly supported.</p> <p>The statement that “the Council has an aspiration to deliver housing and employment growth within our district” is not strong enough and should be amended to state there is a commitment to delivering housing and employment growth. It is also recognised that the Strategic Objectives & Priorities are refined versions of those presented in the adopted Local Plan Strategy. This approach is generally supported and it is considered that these remain broadly relevant however the comments on specific policies highlight that these objectives and priorities cannot be fulfilled by the current proposed spatial strategy, particularly with regard to housing.</p> <p>In relation to Strategic Objective & Priority 6 ‘Meeting Housing Need’ it is noted that this refers to meeting the needs of existing and new residents. However, it is considered this could be strengthened to refer to meeting the unmet housing needs of the wider GBBCHMA which includes Lichfield District.</p> <p>At present there is a lack of detail in the Plan which is needed to demonstrate the viability and deliverability of the strategy (for example amounts of affordable housing required, open space standards) and robust evidence will need to be produced to enable meaningful engagement to ensure a sound plan.</p> <p>The ‘policies map’ should currently be referred to as a ‘proposals map’ until the Plan is adopted.</p>	<p>Comments noted.</p>
LPRPO752	Janet Hodson (JVH) on behalf of Messers Argyle & Bliss	Policy OSS2: Our spatial strategy	<p>Object to the Spatial Strategy as drafted in the Plan. Plan aims to deliver majority of new housing development at 4 locations. It makes no significant provision for Armitage with Handsacre, Shenstone, Hopwas or Elford. Do not consider a growth strategy that relies on this larger sites will deliver within a reasonable timescale given the infrastructure requirements for such sites. A strategy that includes smaller and medium sized allocations would be a more reliable vehicle for the delivery of new homes. Small and medium sized developments can be more readily assimilated into the existing settlement hierarchy and within the landscape context of the District. This means a variety of new homes would be available through a more diverse strategy to the allocation of new homes.</p> <p>Strategic location north of Lichfield conjoins Lichfield City with Fradley leading to a conurbation effect making Fradley a suburb of Lichfield. Gap between the allocation and Fradley employment area is approx. 65m which is not separation in any meaningful sense of the word.</p> <p>Do not consider that the site selection methodology is robust in its analysis of sites, and their agricultural land classification. Weighting system that is finally used to determine the allocated sites is not transparent.</p>	<p>Comments noted. The Preferred Options document sets the spatial distribution of growth, including strategic housing allocations and housing requirements for settlements and levels of the settlement hierarchy. The document includes smaller existing allocations as set out at Appendix A of the preferred options document. The preferred options includes a proposal to identify new Green Belt to the north of Lichfield City within the gap between Lichfield and Fradley.</p>
LPRPO753	Janet Hodson (JVH) on behalf of Messers Argyle & Bliss	Policy NS1: New settlement	<p>Plan indicates that in future review of the plan a new settlement will be a preferred location for new housing development. Do not agree that a new settlement is the right approach. If such a policy remains in the plan it will pre-judge the strategy of a future plan review when circumstances will potentially be very different. New settlements require significant forward investment and it is considered unlikely this will be a viable and deliverable solution.</p> <p>Alignment of a new settlement to existing road transport corridors and out of the Green Belt is unlikely to be the most sustainable way to accommodate new growth and development.</p>	<p>Comments noted. The Local Plan Review seeks to set the direction of growth within the plan period and look toward provision for a future review of the plan.</p>

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO754	Janet Hodson (JVH) on behalf of Messers Argyle & Bliss	Policy OHF1: Housing provision	<p>Policy sets out the overall housing provision over the plan period and the four strategic locations. We do not consider that the Whittington allocation is strategic and is small in comparison to other proposed sites. It appears from the policy that housing needs are to be met by both the strategic allocations and land within the settlements although this is not clearly set out. Policy needs to be more clearly set out. Policy sets out that outside identified locations there will be no development other than infill within settlement boundaries, conversions, rural exceptions and neighbourhood plan sites.</p> <p>Consider the plan should allocate sites in Armitage, Fazeley, Shenstone and Hopwas and the wider rural area rather than leave these to neighbourhood planning. If alterations to the Green Belt are required it should be dealt with through the District Plan. Specifically object to the urban extension at Fazeley and consider more appropriate sites have not been allocated.</p>	<p>Comments noted. The Preferred Options document sets the spatial distribution of growth, including strategic housing allocations and housing requirements for settlements and levels of the settlement hierarchy. The document includes smaller existing allocations as set out at Appendix A of the preferred options document. The preferred options includes a proposal to identify new Green Belt to the north of Lichfield City within the gap between Lichfield and Fradley.</p>
LPRPO755	Janet Hodson (JVH) on behalf of Messers Argyle & Bliss	Policy OHF4: Affordable housing	<p>Policy seems to indicate every housing site will be required to deliver affordable housing, there is no threshold. The NPPF sets out that affordable housing should not be required on sites of less than 10 dwellings. If this is what the Policy means it should say so. It is not clear what the percentage of affordable homes required will be.</p> <p>Do not consider that conversions should be included in the affordable calculations and particularly of historic/listed buildings where the conversions costs are significant and where the imperative in that situation is the preservation and future use of a heritage asset. Our experience of trying to deliver affordable housing is a poor one. Council need to take a more flexible approach to the delivery of affordable homes on some sites, especially in the rural areas where housing associations are reluctant to take properties in small numbers. More thought needs to be given to the mix required in s106 agreements to have inbuilt flexibility. The overall objective should be the delivery of affordable homes rather than a theoretical mix prescribed at a time where there is little knowledge of what is actually required. We do not consider the present arrangements to be satisfactory.</p>	<p>Comments noted. Proposed policy OHF2 seeks to deliver a mix of dwellings to meet the needs of the District's demographic including provision of starter and affordable homes and smaller homes. Evidence in relation to viability and the level of a affordable homes to be required is being collected.</p>
LPRPO756	Janet Hodson (JVH) on behalf of Messers Argyle & Bliss	Policy ONR1: Green Belt	<p>We support the concept of changes to the green belt to accommodate new housing growth in sustainable locations.</p>	<p>Support noted.</p>
LPRPO757	Janet Hodson (JVH) on behalf of Messers Argyle & Bliss	Vision for Hopwas	<p>Hopwas is a sustainable settlement and identified as such in the settlement hierarchy. There are no proposals to amend Green Belt boundary around the village to identify safeguarded land. Site proposed by representation is a modest extension consummate in size with the settlement without compromise to the green belt purpose. The land should be recognised as an allocation or at least safeguarded for the future.</p> <p>Object to the vision for Hopwas and the fact only infill development will be permitted. Hopwas is designed as a Level 4 service village and is acknowledged as a sustainable location with good transport links to Tamworth and Lichfield. Clear opportunity for development east of Plantation Lane where a development of 35 dwellings could be accommodated. There is little scope for infilling in Hopwas in any event and infilling within the existing Conservation Area will only raise other difficulties and compromise the existing built form. Most sensible approach would be to allow modest extension to the settlement.</p>	<p>Comments noted. The Preferred Options document sets the spatial distribution of growth, including strategic housing allocations and housing requirements for settlements and levels of the settlement hierarchy. The document includes smaller existing allocations as set out at Appendix A of the preferred options document. The preferred options includes a proposal to identify new Green Belt to the north of Lichfield City within the gap between Lichfield and Fradley.</p>
LPRPO758	Janet Hodson (JVH) on behalf of Walton Homes	Policy OSS2: Our Spatial Strategy	<p>Object to the Spatial Strategy as drafted in the Plan. The four identified locations are strategic locations for growth with large sites at Lichfield Fradley and Fazeley. Do not consider that a growth strategy that relies heavily on three large strategic sites will deliver homes within a reasonable timescale given the infrastructure requirements for such large sites and that a Strategy that includes smaller and medium sized allocations would be a more reliable vehicle for the delivery of new homes.</p> <p>The strategic location north of Lichfield conjoins Lichfield City with Fradley leading to a conurbation effect, Fradley cannot realistically be regarded as a separate settlement but merely a suburb of Lichfield. The so-called gap between the edge of the strategic housing allocation and the Fradley employment area is approx. 65 metres wide. This is not separation in any meaningful sense of the word.</p> <p>The Policy sets out that sustainable extensions to existing settlements will be promoted through the District, but it is not clear if these are just at the 4 locations that are denoted or if other extensions to settlements are proposed. The Policy as drafted is unclear on this matter.</p> <p>Does not consider that the site selection methodology is robust inter alia in its analysis of sites and their Agricultural attribution. The weighting system that is finally used to determine the allocated sites is not transparent. For example Site 152 west of Mile Oak is a proposed strategic allocation yet it includes Grade 2 agricultural land and lies within an area of green belt defined as "important". Other nearby sites with lower quality land and less green belt impact are dismissed. The site selection methodology is flawed and does not rationally underpin the proposed allocations in the plan</p>	<p>Comments noted. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process. A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements.</p>

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO759	Janet Hodson (JVH) on behalf of Walton Homes	Policy NS1: New settlement	<p>Does not agree that a new settlement is the right approach to new growth in the future. If such a policy remains in the Plan then this will pre judge the growth strategy for a future plan review, when circumstances will potentially be very different to the current situation.</p> <p>New settlements require significant forward investment and it is considered unlikely that this will be a viable and deliverable solution. The alignment of a new settlement to existing road transport corridors and out of the green belt is unlikely to be the most sustainable way to accommodate new growth and development.</p>	Comments noted
LPRPO760	Janet Hodson (JVH) on behalf of Walton Homes	Policy OHF1: Housing Provision	<p>Does not consider that the Whittington allocation for 75 new homes is indeed a strategic allocation, and compared to the other three allocations is effectively only a small site.</p> <p>Appears from policy that housing needs are to be met by both the strategic allocations and land within the settlements in the hierarchy, although this is not clearly set out as to how much development is to be found outside of the strategic allocations. Policy needs to be more clearly set out, rather than having to rely on further sections of the plan to establish where the remaining housing numbers are coming from.</p> <p>Policy sets out that outside of identified locations there will be no development other than infill within defined boundaries, conversions, rural exceptions and Neighbourhood Plan sites. Plan should set out that small scale development adjacent to lower order settlements can be acceptable where it is sustainable and meets a housing need.</p> <p>Table 13.1 presents the distribution of new housing, however there are no totals on the table and the overall housing allocation in column 1 adds up to 11,568 rather than 11,800 as stated in the following text.</p> <p>The second column of the table is really commitments and should be split between actual allocations and sites with planning permission for a clear understanding of the Plan. The third column's adds to 5,345 dwellings to be allocated in this plan with some of this requirement being left to neighbourhood plans.</p> <p>Consider that this Plan should allocate sites in Armitage, Fazeley, Shenstone and the wider rural area rather than leave these to Neighbourhood Planning. If alterations to the green belt are required it should be for the District Plan to deal with these questions through an overview.</p> <p>Specifically object to the large urban extension at Fazeley of 800 units. Other more appropriated sites have not been allocated at this settlement which are deliverable in a shorter timescale and are of a size that make then attractive to a wide variety of housebuilders.</p>	<p>Comments noted. Comments noted. Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.</p> <p>A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.</p>
LPRPO761	Janet Hodson (JVH) on behalf of Walton Homes	Policy OHF4: Affordable housing	<p>Policy appears to be saying that every single housing site will be required to deliver affordable housing, there is no threshold indicated in the Policy for affordable housing to be required. NPPF sets out that affordable housing should not be required on sites of less than 10 dwellings (major developments) If this is what the Policy means it should say so.</p> <p>Not clear at the time of writing what the percentage of affordable homes will be required and further input will be made on this in the future. Do not consider that conversions should be included in the affordable calculations and particularly of historic /Listed Buildings. Where the conversions costs are significant, and where the imperative in that situation is the preservation and future use of a Heritage Asset.</p> <p>Council need to take a more flexible approach to the delivery of affordable homes on some sites, especially in the rural areas , where often the approved housing associations are reluctant to take properties in small numbers or some locations. More thought needs to be given to the mix required in S 106 agreements and to have some inbuilt flexibility, rather than a rigid prescription. Do not consider the present arrangements to be at all satisfactory.</p> <p>The process and methodology for off site contributions should be carefully thought through, at the present it is an SPD and this is a document not properly tested through the development plan.</p>	Comments noted. Evidence within the HEDNA suggests the Council will be justified in seeking to achieve as much affordable housing as viably possible on appropriate development sites. Further viability evidence is being collected which will inform the policy and provide a clear position in terms of the appropriate level of affordable housing to be sought.
LPRPO762	Janet Hodson (JVH) on behalf of Walton Homes	Policy ONR1: Green Belt	Support the concept of changes to the Green Belt to accommodate new housing growth in sustainable locations.	Support noted.
LPRPO763	Janet Hodson (JVH) on behalf of Walton Homes	Whole document, Chapter 20: Larger service villages (Armitage with Handsacre) & Green Belt Review	<p>Armitage with Handsacre is shown within the Green Belt Review as having no safeguarded land or alteration to the Green Belt boundary, considered to be flawed. Settlement can be expanded by alteration to the Green Belt in the area of Brick Kiln Farm, which comprises of parcel AH2 which has a moderate impact on the Green Belt.</p> <p>Site should be allocated in the strategy and not left to Neighbourhood Planning to ensure housing needs of Armitage with Handsacre are met within the plan period. Notwithstanding that this site should be allocated for housing it does not need to remain within the Green Belt in the longer term and at the least should be identified as safeguarded land at this sustainable settlement location.</p>	Comments noted

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO764	Janet Hodson (JVH) on behalf of Walton Homes	Chapter 20: Larger Service Villages & Vision for Armitage with Handsacre	<p>Considers that 150 dwellings should not be allocated through the Neighbourhood Plan process and requirement should be met through the Local Plan. Land is available at Brick Kiln Farm immediately adjoining the built up area to accommodate around 100 dwellings and is a deliverable and sustainable site. Site lies central to the built up area and can assist in the consolidation of the built area without the danger of elongating the settlement shape. Site is well located to all village facilities off Shropshire Brook Road.</p> <p>Site Selection Methodology in unreliable in respect of Agricultural Land Classification for individual sites.</p>	Comments noted. Strategy enables smaller settlement to grow and for local communities through Neighbourhood Plans to identify a non-strategic level of growth.
LPRPO765	Janet Hodson (JVH) on behalf of Walton Homes	Policy OR1: Smaller Rural villages and our wider rural areas	<p>Objects to Policy OR1 as it concerns Elford. Elford is a settlement that can accommodate some growth. Development is proposed to the north of the settlement including open land to form a green central feature. Site was proposed in the final draft version of the Elford Neighbourhood Plan as a site suitable for modest expansion of the settlement.</p> <p>Development Plan should set out development proposals for the smaller villages other than infilling and conversions. Smaller settlements need to have some organic growth to maintain their existing facilities and provide choice within housing stock as well as affordable housing opportunities.</p> <p>Amount of development available for smaller villages at 200 units is insufficient over the plan period. It is also not known how this will be monitored through the production of Neighbourhood Plans to ensure that sufficient land is brought forward to meet the requirement when it set.</p>	Comments noted. Strategy enables smaller settlement to grow and for local communities through Neighbourhood Plans to identify a non-strategic level of growth.
LPRPO766	D Oakley (RPS Group) for Fradley Consortium	Chapter 13: Our homes for the future	Do not agree with the identification of the preferred site allocations as identified and, consequently, they are not soundly-based and so should be deleted, and a new set of site allocations identified that follow clear audit trail in terms of site selection. Suggest that for consistency the settlement policies should be amended to specifically include reference to a dwelling target (subject to amendment in line with our representations on the need for additional land and sites discussed under Policies OSS2 and OHF1). The dwelling targets should be expressed as 'minima' which is not simply the local housing need for Lichfield.	Comments noted. Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO767	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	Chapter 10: Our sustainable communities	The approach to sustainable development set out in Policy OSC1 is generally supported where it is consistent with national policy. Certain aspects of the policy as currently drafted should be refined. In particular, the policy wording in relation to air quality states that "no decline in standards being deemed acceptable as a result of new development." This wording is not clear and it is suggested it should be clarified that its intention is that new development should not cause air quality standards to be exceeded. Policy OSC4 is generally supported however should be updated to reflect national design policy guidance. It is noted that masterplans are required for strategic developments (defined as over 100 dwellings) only. This approach is supported. The approach set out in Policy OSC5 is broadly supported but the wording needs to be amended to reflect national policy and guidance.	Comments noted. Wording related to air quality to be reviewed.
LPRPO768	J Holt	Whole document	Oppose building in the Green Belt areas within Burntwood, particularly Hospital Road, west of Norton lane as defines the border of Burntwood and Hammerwich preventing these towns from merging. Gives local residents open views to the countryside, provides habitat for wildlife, support enhanced biodiversity. Norton Lane no capacity for increase in traffic.	The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO769	S Biggs	Policy SHA2: Strategic housing allocation land west of Fazeley	Proposal deeply and irrevocably flawed. Would ruin rural character of the settlement. Causes huge ecological damage and environmental harm. No infrastructure to support development - roads, medical facilities, schools already overburdened. Sites more suitable for Lichfield housing closer to Lichfield.	Comments noted. Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO770	S Lake (Turley) for Taylor Wimpey	Chapter 7: Our vision	The proposed vision should be made stronger with greater emphasis placed on the 'need' and/or 'will' to deliver growth rather than an "aspiration" to.	Comments noted.
LPRPO771	S Lake (Turley) for Taylor Wimpey	Chapter 8: Our strategic objectives & priorities	Do not make reference to the housing needs arising from the GBHMA.	Comments noted
LPRPO772	S Lake (Turley) for Taylor Wimpey	Policy OSS2: Our spatial strategy	A significant gap of four years between the assessed local housing need and the 'full plan period' making the PO non-compliant. Concerned with the preferred spatial strategy does not include a new allocation of growth via a strategic allocation at Armitage with Handsacre. Does not adequately express the exceptional circumstances for removing land from the Green Belt.	Comments noted. Addendum HEDNA document to be provided in due course. Green Belt Review 2019 makes clear that 'exceptional circumstances' would need to be demonstrated if changes to the Green Belt boundary are proposed. This has been judged to be the case in the preferred options document as stated at paragraph 16.5 in terms of meeting development needs and the identification of new Green Belt to the north of Lichfield City.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO773	S Lake (Turley) for Taylor Wimpey	Policy OHF1: Housing provision	Not sufficiently focussed. GBHMA contribution should be clearly stated in a policy rather than explanatory text. There is clear evidence of a greater local need for housing in Lichfield beyond the minimum figure generated by the standard method. Should elevate its housing requirement and seek to provide at least 600 dwellings per annum, which would equate to a requirement of 13,200 dwellings over the plan period. In addition, it is important that the District's local need and contribution towards the HMA is clearly articulated. Critical that the emerging LPR, either via a stand-alone strategic policy or within Strategic Policy OHF1 makes specific reference that if a neighbourhood plan does not progress within a specific timeframe, the District Council will as the local planning authority allocate sites for housing through a separate development plan document (e.g. a Site Allocation Plan). Should identify broad location for growth at Armitage with Handsacre. Strongly support the identification of Armitage with Handsacre as an existing settlement to accommodate a proportionate scale of growth that provides for local needs and helps to deliver an enhanced village environment, performs better than Fazeley and Fradley in the settlement sustainability study. The existing distribution of housing growth of 150 new homes through the emerging LPR should be significantly increased to align with its scoring against sustainability criteria. Existing distribution to Fazeley, Mile Oak and Fradley is disproportionate and inappropriate.	Comment noted. Housing requirement is based upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review. The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period.
LPRPO774	S Lake (Turley) for Taylor Wimpey	Chapter 13: Our homes for the future	OHF2 welcome that the final mix will be subject to negotiation at the planning application stage this is justified as demography and market signals will change over the plan period. Agree that development proposals must make the most efficient use of land and be developed at the optimum density.	Support noted.
LPRPO775	S Lake (Turley) for Taylor Wimpey	Policy OHF4: Affordable Housing	Objects to the policy principle that: "Affordable housing should be provided on site and only in very exceptional circumstances will contributions in lieu. Should say can be provided off-site or an appropriate financial contribution paid in-lieu if it can be robustly justified.	Comments noted.
LPRPO776	S Lake (Turley) for Taylor Wimpey	Policy SHA1: Strategic housing allocation North of Lichfield	Unlikely that the entirety of the full allocation will be delivered within the plan period, which poses a significant risk to the delivery and soundness of the LPR, particularly in respect to meeting the needs of the District and the wider HMA deemed more appropriate that a greater proportion of housing is directed to larger service villages, such as Armitage with Handsacre.	Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed. Policy SHA1 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO777	S Lake (Turley) for Taylor Wimpey	Chapter 20: Larger service villages	There is a need for the emerging LPR to recognise the importance of promoting sustainable development in rural areas. such as Armitage with Handsacre which may support services in nearby villages. For example, the villages of Upper Longdon, Longdon, Longdon Green and Hill Ridware are reliant on the services and facilities at Armitage with Handsacre, which will only be maintained and enhanced to service these smaller settlements if additional housing growth is apportioned to Armitage with Handsacre over the plan period to 2040.	Comments noted.
LPRPO778	S Lake (Turley) for Taylor Wimpey	Policy SHA2: Strategic housing allocation land west of Fazeley	Strongly objects. The exceptional circumstances for the removal of land from the Green Belt at Fazeley, Mile Oak & Bonehill have not been comprehensively defined. The strategic housing allocation at land west of Fazeley is not supported by proportionate evidence.	Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice. Green Belt Review 2019 makes clear that 'exceptional circumstances' would need to be demonstrated if changes to the Green Belt boundary are proposed. This has been judged to be the case in the preferred options document as stated at paragraph 16.5 in terms of meeting development needs and the identification of new Green Belt to the north of Lichfield City. Further evidence in process of collection and will continue to inform the emerging Local Plan Review
LPRPO779	S Lake (Turley) for Taylor Wimpey	Policy SHA3: Strategic housing allocation land north and south of Hay End Lane, Fradley	Strongly objects. The strategic housing allocation at land north and south of Hay End Lane (i.e. at Fazeley, Mile Oak & Bonehill) is not developable and is incorrectly assessed in the SHLAA.	A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO780	Janet Hodson (JVH) on behalf of mr Sketchley	Policy ONR1: Our Green Belt	Support the concept of changes to the Green Belt to accommodate new housing growth in sustainable locations. Green Belt should make allowance for new employment land within allocations or safeguarded sites where growth is proposed. We object to the inclusion of land to the north west of Mile Oak cross roads within the Green Belt. The land is well contained by development and infrastructure and should be released for development. There is no commercial allocation at the western edge of Fazeley and the land proposed by the representation along within the existing employment for a limited commercial allocation.	Support noted. Existing allocated employment areas are identified on the policies maps which accompanied the Preferred Options document. Current evidence suggests there are limited additional options for locating employment growth, this is explicitly referred to within the consultation document.
LPRPO781	Janet Hodson (JVH) on behalf of mr Sketchley	Policy OEET1: Our employment and economic development	Object to the policy as drafted as there does not appear to be any allocations for employment land other than existing sites, there are no new sites where new housing is proposed. This does not lead to sustainable development patterns. The plan has not proposed to omit any land from the Green Belt for employment purposes.	Comments noted. The preferred options document notes that development will be directed to allocated employment areas. No further allocations are identified within the document beyond existing allocations. The document makes clear that further allocations may be considered to meet the identified employment need.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO782	S Lake (Turley) for Taylor Wimpey	Whole document	The proposed vision and strategic objectives and priorities need to be consistent on the need to address the GBHMA housing shortfall. The District Council need to plan for the 'full plan period' to anticipate and respond to long term requirements and opportunities. There is a greater local need for housing in the District beyond the minimum figure generated by the standard method. There is insufficient direction for growth at Armitage with Handsacre through the neighbourhood planning process. The full allocation of 3,300 new homes at land north of Lichfield will not be delivered in the plan period. The distribution of housing growth to Fradley and Fazeley, Mile Oak & Bonehill is disproportionate. The level of housing growth at Armitage with Handsacre has been wholly suppressed and additional housing growth should be apportioned in line with its assessment in the Settlement Sustainability Study (October 2018). The exceptional circumstances for the removal of land from the Green Belt at Fazeley, Mile Oak & Bonehill have not been comprehensively defined. The strategic housing allocation at land west of Fazeley is not supported by proportionate evidence. The strategic housing allocation at land north and south of Hay End Lane is not developable. Clients land at land south of Rugeley Road at Armitage with Handsacre is deliverable for residential use.	Comments noted.
LPRPO783	I Deverell (Turley) for Redrow Homes	Whole document	Para1.2 Support pro-growth, however there is a greater local need beyond the minimum figure and statement is unjustified. Para 2.11 supports the plan period to 2040, but wishes to highlight that the fourteen HMA authorities must co-operate and agree how the unmet housing needs are to be delivered through local plan reviews over any differing plan periods.	Comments noted
LPRPO784	Janet Hodson (JVH) on behalf of Shipley Baxter LLP	Policy OSS2: Our Spatial Strategy	Object to the Spatial Strategy as drafted in the Plan. Plan aims to deliver majority of new housing development at 4 locations. It makes no significant provision for Armitage with Handsacre, Shenstone, Hopwas or Elford. Do not consider a growth strategy that relies on this larger sites will deliver within a reasonable timescale given the infrastructure requirements for such sites. A strategy that includes smaller and medium sized allocations would be a more reliable vehicle for the delivery of new homes. Small and medium sized developments can be more readily assimilated into the existing settlement hierarchy and within the landscape context of the District. This means a variety of new homes would be available through a more diverse strategy to the allocation of new homes. Strategic location north of Lichfield conjoins Lichfield City with Fradley leading to a conurbation effect making Fradley a suburb of Lichfield. Gap between the allocation and Fradley employment area is approx. 65m which is not separation in any meaningful sense of the word. Do not consider that the site selection methodology is robust in its analysis of sites. and their agricultural land classification. Weighting system that is finally used to determine the allocated sites is not transparent.	Comments noted. The Preferred Options document sets the spatial distribution of growth, including strategic housing allocations and housing requirements for settlements and levels of the settlement hierarchy. The document includes smaller existing allocations as set out at Appendix A of the preferred options document. The preferred options includes a proposal to identify new Green Belt to the north of Lichfield City within the gap between Lichfield and Fradley.
LPRPO785	Janet Hodson (JVH) on behalf of Shipley Baxter LLP	Policy NS1: New settlement	Does not agree that a new settlement is the right approach to new growth in the future. If such a policy remains in the Plan then this will pre judge the growth strategy for a future plan review, when circumstances will potentially be very different to the current situation. New settlements require significant forward investment and it is considered unlikely that this will be a viable and deliverable solution. The alignment of a new settlement to existing road transport corridors and out of the green belt is unlikely to be the most sustainable way to accommodate new growth and development.	Comments noted. The Local Plan Review seeks to set the direction of growth within the plan period and look toward provision for a future review of the plan.
LPRPO786	Janet Hodson (JVH) on behalf of Shipley Baxter LLP	Policy OHF1: Housing Provision	Does not consider that the Whittington allocation for 75 new homes is indeed a strategic allocation, and compared to the other three allocations is effectively only a small site. Appears from policy that housing needs are to be met by both the strategic allocations and land within the settlements in the hierarchy, although this is not clearly set out as to how much development is to be found outside of the strategic allocations. Policy needs to be more clearly set out, rather than having to rely on further sections of the plan to establish where the remaining housing numbers are coming from. Policy sets out that outside of identified locations there will be no development other than infill within defined boundaries, conversions, rural exceptions and Neighbourhood Plan sites. Plan should set out that small scale development adjacent to lower order settlements can be acceptable where it is sustainable and meets a housing need. Table 13.1 presents the distribution of new housing, however there are no totals on the table and the overall housing allocation in column 1 adds up to 11,568 rather than 11,800 as stated in the following text. The second column of the table is really commitments and should be split between actual allocations and sites with planning permission for a clear understanding of the Plan. The third column's adds to 5,345 dwellings to be allocated in this plan with some of this requirement being left to neighbourhood plans. Consider that this Plan should allocate sites in Armitage, Fazeley, Shenstone and the wider rural area rather than leave these to Neighbourhood Planning. If alterations to the green belt are required it should be for the District Plan to deal with these questions through an overview. Specifically object to the large urban extension at Fazeley of 800 units. Other more appropriated sites have not been allocated at this settlement which are deliverable in a shorter timescale and are of a size that make then attractive to a wide variety of housebuilders.	Comments noted. The Preferred Options document sets the spatial distribution of growth, including strategic housing allocations and housing requirements for settlements and levels of the settlement hierarchy. The document includes smaller existing allocations as set out at Appendix A of the preferred options document. The preferred options includes a proposal to identify new Green Belt to the north of Lichfield City within the gap between Lichfield and Fradley.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO787	Janet Hodson (JVH) on behalf of Shipley Baxter LLP	Policy OHF4: Affordable housing	<p>Policy appears to be saying that every single housing site will be required to deliver affordable housing, there is no threshold indicated in the Policy for affordable housing to be required. NPPF sets out that affordable housing should not be required on sites of less than 10 dwellings (major developments) If this is what the Policy means it should say so.</p> <p>Not clear at the time of writing what the percentage of affordable homes will be required and further input will be made on this in the future. Do not consider that conversions should be included in the affordable calculations and particularly of historic /Listed Buildings. Where the conversions costs are significant, and where the imperative in that situation is the preservation and future use of a Heritage Asset.</p> <p>Council need to take a more flexible approach to the delivery of affordable homes on some sites, especially in the rural areas , where often the approved housing associations are reluctant to take properties in small numbers or some locations. More thought needs to be given to the mix required in S 106 agreements and to have some inbuilt flexibility, rather than a rigid prescription. Do not consider the present arrangements to be at all satisfactory.</p> <p>The process and methodology for off site contributions should be carefully thought through, at the present it is an SPD and this is a document not properly tested through the development plan.</p>	Comments noted. Proposed policy OHF2 seeks to deliver a mix of dwellings to meet the needs of the District's demographic including provision of starter and affordable homes and smaller homes. Evidence in relation to viability and the level of a affordable homes to be required is being collected.
LPRPO788	Janet Hodson (JVH) on behalf of Shipley Baxter LLP	Policy ONR1: Green Belt	<p>Support the concept of changes to the green belt to accommodate new housing growth in sustainable locations.</p> <p>Support the concept of safeguarded land but consider that the land north of Mile Oak which is shown as safeguarded should be released for development in this plan period to deliver 100 new homes. Land is well contained and within the green belt study forms the most significant part of parcel FZ 9.It has no impact at all on the first four purposes of the green belt and only a minor impact on the fifth. This is in direct contrast to the proposed allocation site which is scored as having a moderate impact on the green belt and clearly is a less favourable site to release from the green belt than FZ9.There is no logic to releasing sites from the green belt for development which have a greater impact on the purposes of the green belt than sites which produce a lesser impact.</p> <p>Site FZ9 is a sound site for development in this plan period and should be proposed as a strategic location for development replacing the proposed large allocation to the south of the Mile Oak Crossroads.</p>	Comments noted
LPRPO789	Janet Hodson (JVH) on behalf of Shipley Baxter LLP	Policy SHA2: Strategic housing allocation land west of Fazeley & Vision for Fazeley	<p>Consider that Fazeley is an appropriate location for new housing development, however considers that 800 dwellings to the south of Mile Oak Junction is not the right location.</p> <p>Proposed strategic allocation further elongates the settlement and takes it far west into the open countryside. Considered a large allocation for a settlement that has up to now grown incrementally by way of developments of around 50-100 dwellings.</p> <p>Land is available on the north east side of the Mile Oak Crossroads which is suitable for development and should be allocated in this Plan as a strategic housing allocation. Site can accommodate around 100 dwellings, work has been carried out to establish that highways, flood risk, ecology, archaeology and ground conditions can accommodate the proposed development. Indicative layout demonstrates 110 plots with a housing mix of 25% detached dwellings and 75% semi-detached dwellings.</p> <p>Do not agree with the site selection methodology analysis of this site and the deemed agricultural land classification. The land is not in agricultural production and does not form part of any active agricultural holding. All of these matters influence the agricultural potential of the site.</p> <p>Release of the land to the north east of the Mile Oak Crossroad is superior in terms of Green Belt impact over the proposed suggested site. Impact from subject site is consider to be minor whereas the proposed allocation is deemed to have a moderate impact. Green Belt Review on assessed part of the proposed allocation within Zone FZ1, the allocation stretches further into Green Belt land where it is noted in the Review document as 'important'. Difficult to understand how this proposed strategic allocation has been chosen given the Green Belt impact together with the impact on the shape of the settlement.</p> <p>Do not have confidence that existing commitments in Fazeley which amount to 124 dwellings are likely to materialise during the Plan Period. Tolsons Mill has proven unviable over the years and is highly unlikely to deliver despite having planning permission. It is also unlikely to deliver affordable housing given the viability issues it has encountered.</p> <p>As housing figures are minimal there is no harm in allocation an additional site in the settlement which is deliverable on</p>	Comments noted. A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO790	I Deverell (Turley) for Redrow Homes	Chapter 5: Profile of the district	<p>Population has grown by 2.18% since 2010 and there is a larger than average ageing population (almost 20% aged 65 or over) as well as a diminishing working age population, as the second largest settlement in the District it is critical that a sufficient scale and type of residential development is delivered in Burntwood to secure a more balanced population profile for the Town, particularly to retain and attract working age residents. Town has therefore played an invaluable role in offering low cost housing. Additional issues identified for Burntwood: A stagnating population with a need for a more balanced profile to avoid an increasingly ageing population and a diminishing working age population. The data reveals that these issues are more pronounced for Burntwood compared with the District as a whole; and significantly increasing house prices (28% increase since 2013).</p>	Comments noted

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO791	I Deverell (Turley) for Redrow Homes	Chapter 7: Our vision	Support. Suggest make stronger with greater emphasis placed on the 'need' and/or 'will' to deliver growth rather than an "aspiration" to. As new settlement is simply only a concept which is anticipated to meet needs post-2040, Redrow question whether it is appropriate to reference a new settlement in the Vision.	Support noted
LPRPO792	I Deverell (Turley) for Redrow Homes	Chapter 8: Our strategic objectives & priorities	Broadly align. Should make reference to housing needs from GBHMA. Not considered appropriate to include reference to the 'concept' of a new settlement within the Strategic objectives and priorities within the LPR period (up to 2040) as this is simply a concept which is anticipated.	Comments noted.
LPRPO793	I Deverell (Turley) for Redrow Homes	Policy OSS2: Our spatial strategy	The housing requirement should not be included leave in OHF1. Concerned that the Council have unduly suppressed the level of housing growth directed to Burntwood which is totally at odds with the spatial strategy, providing only 7% of housing growth. This disproportionate level of growth. Not considered appropriate to include reference to the 'concept' of a new settlement within the Spatial Strategy for the LPR period up to 2040 and should be removed. Further strategic allocations are required to deliver the housing requirement and specifically at Burntwood, as the second tier settlement. Concerns about the ability and realism of neighbourhood planning being able to deliver this quantum of housing.	Comments noted. Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed. Strategy enables smaller settlement to grow and for local communities through Neighbourhood Plans to identify a non-strategic level of growth. The plan proposes for 400 homes to be built within the urban area t Burntwood, to be identified by the neighbourhood plan or future local plan documents.
LPRPO794	I Deverell (Turley) for Redrow Homes	Policy NS1: New settlement	Question the appropriateness of including a specific strategic policy for a speculative new settlement concept, as this is simply a concept which is anticipated to meet needs post-2040,include the process for identifying it as well as its scope and programme within a policy which is specifically concerned with a future local plan review.	Comments noted.
LPRPO795	I Deverell (Turley) for Redrow Homes	Policy OHF1: Housing Provision	Covering an excessive amount of housing policy and is not sufficiently focussed. Need to provide a distinction between District needs and HMA contribution as the actual shortfall to 2040 is still to be confirmed. No need to duplicate strategic sites. Only identified sufficient housing allocations to deliver 11,563 over the plan period, falling 232 homes short of the 'minimum' housing need expressed within OHF1. Need to identify further strategic sites to meet the minimum housing requirement, as well as identifying a suitable buffer to build in flexibility throughout the plan period. There is clear evidence of a greater local need for housing in Lichfield beyond the minimum figure generated by the standard method as no evidence to suggest that local needs have fallen, adherence to the minimum figures generated through the standard method would undermine recovery and more than halve the current build rate. Should be at least 600 dwellings per annum, which would equate to a requirement of at least 13,200 dwellings over the plan period. Support 20-25%supply buffer and no mention of supply buffer, Table 3.1 actually provides a level of provision which is less than the minimum housing requirement- 11,568 dwellings. Redrow contend that the plan should be seeking to deliver at least 600 dwellings per annum, which will require further strategic allocations, including at Burntwood. No clear rationale Burntwood (Tier 2) has only been directed 7% of the minimum housing need. This is clearly disproportionate and unsound. Strong objections to the distribution strategy and considers that the scale of growth distributed to Burntwood is not proportionate, failing to provide for local needs and will not help to deliver a more balanced and sustainable settlement, which has been identified as a strategic priority for the District Council.	Comments noted. Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed. A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO796	I Deverell (Turley) for Redrow Homes	Chapter 19: Burntwood	Burntwood Local Housing Needs Assessment undertaken. Consider Plan seeks to artificially suppress the long-term rate of delivery within Burntwood, ignoring the Town's significant contribution towards boosting housing supply and its status as the second largest settlement within the district in terms of population and employment. Suggest need to provide as many as 3,725 homes in Burntwood, or as few as 2,200 homes based on its proportionate share of jobs. This would continue to require the identification of further strategic allocations capable of accommodating at least 1,360 additional homes, and as many as 2,900 homes. Burntwood is providing a disproportionately small housing allocation this is unsustainable and unsound. The overall level of growth to Burntwood must be increased with additional Strategic Allocations, including clients site at Highfields Road.	Comments noted. Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed. A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO797	Andrew Shalish (Shalish Associates) on Behalf of Lingfield Assets LLP	Policy LC1: Lichfield economy & Policy NR1: Green Belt	Preferred Options makes no specific reference to land at Lichfield South (allocated within the adopted Local Plan Allocations). It is considered that reference should be made within Policy LC1. This would be consistent with 'preferred Policy Lichfield economy' from the previous consultation document. Additionally the allocation within the adopted Local Plan Allocations acknowledges that the allocation has extant planning permission for open Class B1 use. The approval acknowledges the nature of modern international, national and regional headquarters buildings which in addition to offices often contain significant research and development functions, industrial processes and related storage and distribution functions. The allocation acknowledges that to be effective the allocation needs to be flexible. Therefore we request that Policy LC1 be amended to refer to the allocation of high quality Class B1 buildings to meet the requirements of national and regional occupiers and Lichfield South Business Park and request that the key to the proposals map be amended to refer to 'B1 allocation - LC1: Lichfield economy'. Finally, NPPF paragraph 139 advises that when defining Green Belt boundaries 'plans should not include land which it is unnecessary to keep permanently open'. It is not considered appropriate to keep the site within the Green Belt and the sought ought to be removed from the Green Belt. If it is not removed the Policy ONR1: Green belt should be amended to allow for development where it is in accordance with an allocation in the local plan.	The site is allocated within the adopted Local Plan Allocations. Existing non-strategic allocations are included within the preferred options document at Appendix A. it is not considered necessary to remove the site from the Green Belt, particularly given the existing allocation which was considered through the Local Plan Allocations examination.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO798	I Deverell (Turley) for Redrow Homes	Chapter 13: Our homes for the future	Welcome the final mix subject to further negotiation during the planning application stage. This is justified in that demography and market signals will change over the plan period. Agree that development must make the most efficient use of land and be developed at the optimum density 35 dwellings per ha as a minimum standard appropriately allows for flexibility and will enable development proposals to respond sensitively to the surrounding context and character of built-up environments.	Comments noted.
LPRPO799	I Deverell (Turley) for Redrow Homes	Policy OHF4: Affordable housing	Further viability testing to identify the appropriate rate for affordable housing provision. Highly inflexible in its ability to recognise on-site constraints should not include a prescriptive policy on housing mix as needs will change over the plan period. Such a policy would potentially undermine viability and delivery of sites. Should be dealt with as a supplementary planning document which can be regularly updated and should be no "blanket" policy – standards should reflect the needs of specific settlements and areas.	Comments noted. Evidence within the HEDNA suggests the Council will be justified in seeking to achieve as much affordable housing as viably possible on appropriate development sites. Further viability evidence is being collected which will inform the policy and provide a clear position in terms of the appropriate level of affordable housing to be sought.
LPRPO800	I Deverell (Turley) for Redrow Homes	Policy ONR1: Green Belt	Don't adequately express the exceptional circumstances for removing land from the Green Belt. No clear justification or assessment of alternative sites in Burntwood. Contend that clients site land south of Highfields Road provides the most sustainable and deliverable residential opportunity at Burntwood and commend the site to LDC for Green Belt release and allocation.	Comments noted. Green Belt Review 2019 makes clear that 'exceptional circumstances' would need to be demonstrated if changes to the Green Belt boundary are proposed. This has been judged to be the case in the preferred options document as stated at paragraph 16.5 in terms of meeting development needs and the identification of new Green Belt to the north of Lichfield City.
LPRPO801	I Deverell (Turley) for Redrow Homes	Chapter 19: Burntwood	Support the identification of Burntwood as the second tier settlement which should accommodate a proportionate scale of growth. Object to the suppressed level of growth which has been apportioned to Burntwood without any clear justification. Suggest the need to provide as many as 3,725 homes in Burntwood, or as few as 2,200 homes based on its proportionate share of jobs. This would require the identification of further sites capable of accommodating at least 1,360 additional homes, and as many as 2,900 homes, beyond that envisaged under the Preferred Option. evidence provided. Contend that clients site at land south of Highfields Road provides the most sustainable and deliverable residential opportunity at Burntwood and commend the site to LDC for Green Belt release and allocation.	Comments noted. Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed. A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO802	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	Chapter 7: Our vision	It is noted that Vision remains broadly the same as that presented in the adopted Local Plan Strategy. It is considered that it remains relevant and is broadly supported. The statement that "the Council has an aspiration to deliver housing and employment growth within our district" is not strong enough and should be amended to state there is a commitment to delivering housing and employment growth. It is also recognised that the Strategic Objectives & Priorities are refined versions of those presented in the adopted Local Plan Strategy. This approach is generally supported and it is considered that these remain broadly relevant however the comments on specific policies highlight that these objectives and priorities cannot be fulfilled by the current proposed spatial strategy, particularly with regard to housing. In relation to Strategic Objective & Priority 6 'Meeting Housing Need' it is noted that this refers to meeting the needs of existing and new residents. However, it is considered this could be strengthened to refer to meeting the unmet housing needs of the wider GBBCHMA which includes Lichfield District. At present there is a lack of detail in the Plan which is needed to demonstrate the viability and deliverability of the strategy (for example amounts of affordable housing required, open space standards) and robust evidence will need to be produced to enable meaningful engagement to ensure a sound plan. The 'policies map' should currently be referred to as a 'proposals map' until the Plan is adopted.	Comments noted and areas of support.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO803	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	Policy OSS2: Our spatial strategy	<p>The pro-active approach taken to providing a contribution of dwellings towards the GBBCHMA shortfall is welcomed however, it is not clear how the figure of 4,500 dwellings has been identified. It is acknowledged that there is a separate draft policy regarding a new settlement and this is commented on separately. However, it should be clarified in SP OSS2 how the figure of 4,500 dwellings has been derived and what evidence this is based on as this does not appear to have been explained.</p> <p>South Staffordshire District Council is proposing to test a contribution of 4,000 dwellings based upon the minimum levels of growth implied by the strategic areas of search identified within the District in the Strategic Growth Study. The 4,000 dwellings figure has been calculated on the basis that it provides a minimum contribution on respect of all recommended areas of search identified with the Strategic Growth Study (2 x 1,500 dwelling SUE + 2 x 500 dwelling proportionate dispersal locations). South Staffordshire District Council considers this provides certainty to other LPAs within the GBBCHMA that the Council is testing its recommended capacity to accommodate additional growth based upon a consistent HMA-wide evidence base.</p> <p>It is suggested, therefore, that references to specific allocations should be removed from this policy and Table 3.1 Overall Distribution of New Homes should be included in place of this as this sets out where growth will be directed (which will enable the inclusion of a range of sites of different types and sizes, in compliance with NPPF paragraphs 67 and 68) rather than simply listing where larger allocations will be made.</p>	Comments noted. The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period.
LPRPO804	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	Policy NS1: New settlement	It is acknowledged that in accordance with the Strategic Growth Study Lichfield District Council has indicated its support for a new settlement of around 10,000 dwellings within the District. It is agreed that any new settlement would not deliver homes within the next 15 years and therefore cannot be relied upon as a potential source of supply in this Plan. The supporting text acknowledges that a new settlement is a significant undertaking which will take a number of decades to plan for and complete. The infrastructure requirements for a new settlement will be a significant task which will require significant time input. The Strategic Growth Study acknowledged that there is a significant leading time to delivery of large strategic development sites.	Comments noted.
LPRPO805	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	Policy INF1: Delivering our Infrastructure	This draft policy is aimed to providing the infrastructure required by the District's communities and businesses and safeguarding existing infrastructure. This is supported however it is considered there needs to be additional evidence published in support of the Local Plan Review regarding infrastructure in order to provide clarity over what additional infrastructure is required to support the Local Plan Review allocations and how this will be delivered. This should include an update to the Infrastructure Delivery Plan (IDP) and further consultation with the County Council and other relevant consultees.	Comments noted. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO806	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	Policy OST1: Our sustainable transport	The approach to sustainable transport set out in the policies in this section is broadly supported. However, the requirement for all major development proposals to produce a travel plan is too onerous for smaller developments as it would apply to all development of 10 or more dwellings. This threshold should be revised to a higher level. It is noted that parking provision will continue to be determined with reference to the Sustainable Development Supplementary Planning Document (SPD). This is not in line with national policy. It is noted that the policy provides greater flexibility for the provision of parking to be considered for specific development proposals and this is supported.	Comments noted. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO807	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	Policy OHF1: Housing provision	<p>There are four strategic development allocations/areas listed in the policy alongside the approximate number of new homes they will deliver. These allocations reflect the new allocations for growth set out in Strategic Policy OSS2. It is not clear how the spatial strategy has led to this and this needs to be demonstrated and justified, along with further details (and requirements and potential allocations) relating to those settlements which have been 'missed out'.</p> <p>It is not clear how the term 'strategic allocations' has been defined. This is of particular importance as the Council is currently proposing that non-strategic allocations will be made through Neighbourhood Plans.</p> <p>The approach of leaving the allocation of 'non-strategic' sites to Neighbourhood Plans is not supported. This approach is not consistent with national policy.</p> <p>The Local Plan should include alternative provisions should the progress (including review) of any Neighbourhood Plan stall. The Local Plan is also required to provide certainty on where growth will be delivered in order to ensure alignment of infrastructure delivery. This needs broad locations of growth to be identified so that infrastructure needs can be planned for. This should be via an updated Infrastructure Delivery Plan or equivalent document.</p>	Comments noted. Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed. A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO808	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	Policy OHF2: Providing a balanced housing market and optimising housing density	<p>Touch Developments is concerned that in its current form this policy, by referring to specific percentage figures, the plan lacks sufficient flexibility to meet changing housing needs across the District and across the plan period. It is submitted that the most appropriate approach to housing mix is to continue to be guided by market signals, as defined with the most up-to-date Strategic Housing Market Assessment (SHMA). The SHMA should be routinely updated across the plan period which will ensure that housing mix is reflective of market need. In seeking to specify a mix, the policy lacks flexibility to reflect differences across the sub-market areas; changing needs over the plan period and site-specific considerations which will often influence the mix that can be delivered on individual sites. This plan proposes 4,500 additional homes to meet the needs of the GBBCHMA. The housing needs of neighbouring authorities will also be crucial consideration in determining housing mix on developments meeting cross boundary requirements.</p> <p>The policy also sets out minimum net density of 35 dwellings per hectare. This is considered to be broadly appropriate. Developments in Lichfield City, Burntwood Town and locations with good public transport links will be expected to achieve higher densities of approximately 50 dwellings per hectare. It is questioned if this is actually achievable, or indeed appropriate on many sites in Lichfield and Burntwood, particularly those outside of the centres where regard should also be had to context and setting. It is suggested that an amendment to the policy to focus this higher level of density upon centres, with more flexibility.</p>	Comments noted. Proposed policy OHF2 seeks to deliver a mix of dwellings to meet the needs of the District's demographic including provision of starter and affordable homes and smaller homes. Evidence in relation to viability and the level of a affordable homes to be required is being collected.
LPRPO809	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	Policy OHF4: Affordable Housing	As presently drafted, this policy does not yet set an affordable housing rate and instead seeks affordable housing on each housing development to the highest level viably possible. The supporting text clarifies that at time of writing the Council apply a rate of 35% which is currently viable, against a policy target of 40%. The lack of a specific affordable housing threshold in the policy does not accord with either the NPPF or the Viability and Plan Making Planning Practice Guidance (PPG). This should be subject to viability testing to confirm an appropriate figure. The initial viability evidence indicated that 0%, 20%, 30% and 40% would be tested on major development sites. This evidence has determined that a figure of 40% is unlikely to be viable. The policy also seeks to allow flexibility in the tenure, size and type of affordable housing on a scheme by scheme basis. This flexibility is supported and should be delivered with reference to the most up-to-date Strategic Housing Market Assessment (SHMA).	Comments noted. Evidence within the HEDNA suggests the Council will be justified in seeking to achieve as much affordable housing as viably possible on appropriate development sites. Further viability evidence is being collected which will inform the policy and provide a clear position in terms of the appropriate level of affordable housing to be sought.
LPRPO810	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	Policy OEE1: Our employment and economic development	This policy states that approximately 61 hectares of land will be allocated for employment use in accordance with the Housing and Economic Development Needs Assessment 2019. Unclear why the current consultation document has not identified any employment sites and it should be clarified how the Council intends to deliver its employment land needs.	Comments noted. The preferred options document notes that development will be directed to allocated employment areas. Existing allocated employment areas are identified on the policies maps which accompanied the Preferred Options document. Current evidence suggests there are limited additional options for locating employment growth, this is explicitly referred to within the consultation document.
LPRPO811	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	Policy OHSC1: Our healthy & safe communities	The approach to healthy and safe communities in Policy OSHC1 is generally supported. However, the policy states that health and education infrastructure requirements related to strategic development proposals will need to be understood and determined through the Local Plan and accompanying evidence base so that it is clearly demonstrated that the strategic allocations are deliverable. Further work is needed on the evidence base and in relation to viability testing regarding infrastructure.	Comments noted. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO812	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	Policy ONR1: Green Belt	As currently drafted, the policy covers both strategic and development management matters related to Green Belt. The development management matters are addressed by reference to national Green Belt policy however the wording should amended to comply with national policy. It is suggested it would be clearer to separate strategic and development management concerns into separate policies. The recognition of the need to release Green Belt is welcomed and it is clear that the Council has started to produce the exceptional circumstances justification for such a release but this needs to be supported by further evidence. However, the policy then goes on to propose new Green Belt land to define the northern extent of Lichfield city and prevent the coalescence of Lichfield and Fradley. For the proposed new Green Belt between Lichfield city and Fradley it needs to be clearly demonstrated that this meets the above tests.	Comments noted. Green Belt Review is part of the evidence which supports the Local Plan. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.
LPRPO813	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	Chapter 16: Our natural resources	The approach to habitats and biodiversity is generally supported where it is consistent with national policy. Policy ONR5 addresses natural and historic landscape. It is contended that Green Belt is not a landscape designation and is not a 'valued' landscape1. It is therefore not clear why this policy makes reference to the Green Belt and should focus on the AONB and its immediate surroundings. Any policy text regarding beneficial use of the Green Belt should logically be included in the Green Belt policy.	Comments noted. Policy wording to be reviewed.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO814	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	Policy SHA1: Strategic housing allocation North of Lichfield	This allocation proposes 3,300 new dwellings on land between two existing housing allocations; Land North East of Watery Lane, Curborough and Land at Streethay. Development has started on the Streethay allocation however has not commenced on the Watery Lane site. Given the current situation with the applications to facilitate the first phase of development, there are concerns regarding delivery. There is a lack of evidence either in the Plan or in the supporting evidence base that the local infrastructure can be viably upgraded. This allocation aims to deliver 3,300 dwellings in a single location. This equates to 70% of the total dwellings allocated in this Plan. For the reasons outlined above, it is questionable if this allocation will be able to deliver this number of units in this location.	Comments noted. Policy SHA1 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed
LPRPO815	Lichfield City Council	Chapter 5: Profile of the District	The City Council suggests revision of the wording in paragraph 5.15 to read; '.....affordable housing and so the District Council will be looking at achieving 40% affordable housing on all suitable developments. ' The City Council seeks clarification regarding the last comment on existing social infrastructure and would like to know how the District Council intend to increase provisions in health and secondary schools to accommodate further growth of the City.	The Council is progressing further evidence in relation to viability that will ensure the level of affordable housing required is soundly based. The council continues to engage with infrastructure providers to ensure the local plan includes provisions for appropriate infrastructure. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO816	Lichfield City Council	Chapter 7: Our vision	The City Council suggests the following revision of the wording in the Vision for Our District Section; 'Our residents will be able to access quality and genuinely affordable homes '	Affordable homes' are defined within national planning policy.
LPRPO817	Lichfield City Council	Chapter 11: Our infrastructure	Strategic Policy INF1: Delivering our Infrastructure. The City Council suggest the addition of the following text; 'where required funding providers to enable the provision of better infrastructure for example better roads, healthcare and education infrastructure. '	Comments noted. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO818	Lichfield City Council	Chapter 13: Our homes for the future	The City Council suggests the addition of the following text; 'The Council recognises the underperformance in providing genuinely affordable housing within the City, whether by the private sector or housing associations. There will be increased focus on delivering this type of accommodation '. In the penultimate paragraph the City Council suggests the revision of text to read; The District Council will promote the delivery of specialist housing for older and disabled people in Bungalows '. Strategic PolicyOHF4: Affordable Housing. The addition of the following text to paragraph 2; '...and the economic viability of a scheme. However, given the chronic shortage of genuinely affordable rented dwellings, the focus will be on delivering more of these. ' The City Council notes that there is currently a viable rate of 35% of affordable housing and the City Council would want to see 40% achieved in future.	The Council is progressing further evidence in relation to viability that will ensure the level of affordable housing required is soundly based. Evidence within the HEDNA suggests the Council will be justified in seeking to achieve as much affordable housing as viably possible on appropriate development sites. Further viability evidence is being collected which will inform the policy and provide a clear position in terms of the appropriate level of affordable housing to be sought.
LPRPO819	Lichfield City Council	Chapter 15: Our healthy & safe communities	Wish it noted that given the increase in the number of elderly people living in the city there should be an increase in health care.	The Council continues to engage with infrastructure providers to ensure the local plan includes provisions for appropriate infrastructure.
LPRPO820	Lichfield City Council	Whole document	<ul style="list-style-type: none"> The City Council welcomes the revisions of this document. The City Council would wish to see the provision of a multi storey car park close to Trent Valley Train station to aid both commuters and tourists to the City. In general, the City Council would wish to see more affordable and accessible housing being built for young families, the disabled and elderly people. In addition, more bungalows rather than houses/apartments should be built. The City Council would like to see more environmentally friendly houses being built by smaller contractors. The City Council has concerns about the lack of infrastructure to service the number of new houses being built and suggest that provisions are more robust and built in conjunction with new developments. The City Council would like to see more emphasis on reopening formerly closed rail links to improve connectivity between Lichfield City with the surrounding area and its attractions e.g. The National Memorial Arboretum The City Council asks that the District Council liaise with both commercial and public transport providers to deliver a robust service to the City. That due consideration be given to the Neighbourhood Plan given that LDC adopted the LCC Neighbourhood Plan in 2018, with particular reference to the nature of the employment it is trying to promote. 	Comments noted. Preferred options document includes policies on affordable housing and housing mix which are supported by evidence base. Further evidence is being collected to further support the local plan review. The council continues to engage with infrastructure providers to ensure the local plan includes provisions for appropriate infrastructure.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO821	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	Chapter 10: Our Sustainable Communities	The approach to sustainable development set out in Policy OSC1 is generally supported where it is consistent with national policy. Certain aspects of the policy as currently drafted should be refined. In particular, the policy wording in relation to air quality states that "no decline in standards being deemed acceptable as a result of new development." This wording is not clear and it is suggested it should be clarified that its intention is that new development should not cause air quality standards to be exceeded. Policy OSC4 is generally supported however should be updated to reflect national design policy guidance. It is noted that masterplans are required for strategic developments (defined as over 100 dwellings) only. This approach is supported. The approach set out in Policy OSC5 is broadly supported but the wording needs to be amended to reflect national policy and guidance.	Support noted. Wording related to air quality to be reviewed.
LPRPO822	Canal and River Trust	Chapter 5: Profile of the District	Welcomes the reference in paragraph 5.33 to the canal network as part of the historic environment. Request that you add to the end of paragraph 5.33 "The canal network provides both designated and non-designated heritage assets to the district and the communities through which they pass." Consider the canal network to be included within Landscape and Ecology profile, and for the Canal & River Trust to be named with the National Forest and Central Rivers Initiative in paragraph 5.37, wording suggested.	Comments noted on suggest wording.
LPRPO823	Janet Hodson (JVH) on behalf of Mr M Neachell	Policy OSS2: Our Spatial Strategy	Object to the Spatial Strategy as drafted in the Plan. Plan aims to deliver majority of new housing development at 4 locations. It makes no significant provision for Armitage with Handsacre, Shenstone, Hopwas or Elford. Do not consider a growth strategy that relies on this larger sites will deliver within a reasonable timescale given the infrastructure requirements for such sites. A strategy that includes smaller and medium sized allocations would be a more reliable vehicle for the delivery of new homes. Small and medium sized developments can be more readily assimilated into the existing settlement hierarchy and within the landscape context of the District. This means a variety of new homes would be available through a more diverse strategy to the allocation of new homes. Strategic location north of Lichfield conjoins Lichfield City with Fradley leading to a conurbation effect making Fradley a suburb of Lichfield. Gap between the allocation and Fradley employment area is approx. 65m which is not separation in any meaningful sense of the word. Do not consider that the site selection methodology is robust in its analysis of sites. and their agricultural land classification. Weighting system that is finally used to determine the allocated sites is not transparent.	Comments noted. The Preferred Options document sets the spatial distribution of growth, including strategic housing allocations and housing requirements for settlements and levels of the settlement hierarchy. The document includes smaller existing allocations as set out at Appendix A of the preferred options document. The preferred options includes a proposal to identify new Green Belt to the north of Lichfield City within the gap between Lichfield and Fradley.
LPRPO824	Janet Hodson (JVH) on behalf of Mr M Neachell	Policy NS1: New settlement	Does not agree that a new settlement is the right approach to new growth in the future. If such a policy remains in the Plan then this will pre judge the growth strategy for a future plan review, when circumstances will potentially be very different to the current situation. New settlements require significant forward investment and it is considered unlikely that this will be a viable and deliverable solution. The alignment of a new settlement to existing road transport corridors and out of the green belt is unlikely to be the most sustainable way to accommodate new growth and development.	Comments noted. The Local Plan Review seeks to set the direction of growth within the plan period and look toward provision for a future review of the plan.
LPRPO825	Janet Hodson (JVH) on behalf of Mr M Neachell	Policy OHF1: Housing Provision	Does not consider that the Whittington allocation for 75 new homes is indeed a strategic allocation, and compared to the other three allocations is effectively only a small site. Appears from policy that housing needs are to be met by both the strategic allocations and land within the settlements in the hierarchy, although this is not clearly set out as to how much development is to be found outside of the strategic allocations. Policy needs to be more clearly set out, rather than having to rely on further sections of the plan to establish where the remaining housing numbers are coming from. Policy sets out that outside of identified locations there will be no development other than infill within defined boundaries, conversions, rural exceptions and Neighbourhood Plan sites. Plan should set out that small scale development adjacent to lower order settlements can be acceptable where it is sustainable and meets a housing need. Table 13.1 presents the distribution of new housing, however there are no totals on the table and the overall housing allocation in column 1 adds up to 11,568 rather than 11,800 as stated in the following text. The second column of the table is really commitments and should be split between actual allocations and sites with planning permission for a clear understanding of the Plan. The third column's adds to 5,345 dwellings to be allocated in this plan with some of this requirement being left to neighbourhood plans. Consider that this Plan should allocate sites in Armitage, Fazeley, Shenstone and the wider rural area rather than leave these to Neighbourhood Planning. If alterations to the green belt are required it should be for the District Plan to deal with these questions through an overview. Specifically object to the large urban extension at Fazeley of 800 units. Other more appropriated sites have not been allocated at this settlement which are deliverable in a shorter timescale and are of a size that make then attractive to a wide variety of housebuilders.	Comments noted. The Preferred Options document sets the spatial distribution of growth, including strategic housing allocations and housing requirements for settlements and levels of the settlement hierarchy. The document includes smaller existing allocations as set out at Appendix A of the preferred options document. The preferred options includes a proposal to identify new Green Belt to the north of Lichfield City within the gap between Lichfield and Fradley.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO826	Janet Hodson (JVH) on behalf of Mr M Neachell	Policy OHF4: Affordable housing	<p>Policy appears to be saying that every single housing site will be required to deliver affordable housing, there is no threshold indicated in the Policy for affordable housing to be required. NPPF sets out that affordable housing should not be required on sites of less than 10 dwellings (major developments) If this is what the Policy means it should say so.</p> <p>Not clear at the time of writing what the percentage of affordable homes will be required and further input will be made on this in the future. Do not consider that conversions should be included in the affordable calculations and particularly of historic /Listed Buildings. Where the conversions costs are significant, and where the imperative in that situation is the preservation and future use of a Heritage Asset.</p> <p>Council need to take a more flexible approach to the delivery of affordable homes on some sites, especially in the rural areas , where often the approved housing associations are reluctant to take properties in small numbers or some locations. More thought needs to be given to the mix required in S 106 agreements and to have some inbuilt flexibility, rather than a rigid prescription. Do not consider the present arrangements to be at all satisfactory.</p> <p>The process and methodology for off site contributions should be carefully thought through, at the present it is an SPD and this is a document not properly tested through the development plan.</p>	Comments noted. Evidence within the HEDNA suggests the Council will be justified in seeking to achieve as much affordable housing as viably possible on appropriate development sites. Further viability evidence is being collected which will inform the policy and provide a clear position in terms of the appropriate level of affordable housing to be sought.
LPRPO827	Janet Hodson (JVH) on behalf of Mr M Neachell	Policy ONR1: Green Belt	<p>Support the concept of Green Belt to accommodate new housing growth in sustainable locations.</p> <p>Objects to the inclusion of the land off Land North of Aldin Close and North of Lichfield Street within the green belt as depicted on the Proposals Map Inset 11 Fazeley, Mile Oak & Bonehill.</p> <p>Object to Policy ONR1 which maintains the site within the green belt .The site is discussed in the green belt study as having only a moderate impact on the green belt and it is clearly well contained by development and should be considered for release for development or at least designated as safeguarded for the future.</p>	Comments noted.
LPRPO828	Janet Hodson (JVH) on behalf of Mr M Neachell	Policy SHA2: Strategic housing allocation land west of Fazeley Vision for Fazeley	<p>Consider that Fazeley is an appropriate location for new housing development, however considers that 800 dwellings to the south of Mile Oak Junction is not the right location.</p> <p>Proposed strategic allocation further elongates the settlement and takes it far west into the open countryside. Considered a large allocation for a settlement that has up to now grown incrementally by way of developments of around 50-100 dwellings.</p> <p>New development can be accommodated to the north of Lichfield Street, together with the proposed safeguarded land will provide an appropriate and strategic location, which does not take development out into the wider open countryside, is well contained, available and deliverable.</p>	Comments noted.
LPRPO829	Canal and River Trust	Chapter 6: Issues	Can assist with Key Issues: 5,7,9,10,11,12,13, 14,15.	Comment and support noted.
LPRPO830	Canal and River Trust	Chapter 7: Our vision	Welcomes the inclusion of the canal network as a means by which travel by car can be reduced.	Support noted on inclusion of canal network.
LPRPO831	Canal and River Trust	Chapter 8: Our strategic objectives & priorities	Can assist with SO & P 4,5,11,12,13,14,15.	Comments noted.
LPRPO832	Canal and River Trust	Policy OSC1: Securing sustainable development	Trust supports how this policy seeks to prevent pollution occurring as a result of proposed developments and seek greater clarity in how the policy deals with land instability. Suggests rewording.	Comments noted regarding suggest rewording.
LPRPO833	Canal and River Trust	Policy OSC2: Renewables and Low Carbon Energy	Lacks the progressive nature of policies elsewhere in the country which will deliver the low carbon outcomes. Amend to include clearer requirements for new developments to work towards the zero carbon target.	Comments noted.
LPRPO834	Canal and River Trust	Chapter 12: Our sustainable transport	<p>OST1: Canal network can be utilised in a number of locations through the district to widen travel choices, make sustainable means of transport more attractive than the private car; reduce the impact of travel upon the environment; and reduce carbon emissions. The Trust would like to be named as one of the partners that the Council will be working with to achieve these aims, wording suggested. Towpath Design Guide being prepared. OST2: Point 4 of Strategic Policy OST2 is unclear in its wording, as it suggests that all modes of transport should access the development via the road network. The canal network can be utilised in a number of locations through the district to widen travel choices making developments accessible on foot or by cycle which should be included within transport assessments and travel plans for all major developments. Where the canal network infrastructure crosses with the road network particular attention should be given to how developments will protect and manage increased vehicular use over historic canal bridges. Point 6 of Strategic Policy OST2 is unclear in its wording as to whether transport infrastructure includes within its definition infrastructure to support the highway network, such as historic canal bridges; or whether this term just refers to the road and signage that passes over 3rd Party infrastructure. Wording suggested.</p>	Comments noted relating to suggested wording,
LPRPO835	Canal and River Trust	Policy OEET4: Tourism	Welcome the inclusion of the canal network within this policy and add that like other attractions within the district, supporting the future development/improvement of the network's assets is important, so planning restrictions should not hinder future investment.	Support noted.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO836	Shenstone Parish Council	Whole document	Welcome the importance given to neighbourhood plans nationally and also by LDC. Shenstone Parish Council will be reviewing the three neighbourhood plans within the Parish Council boundary. Shenstone Parish Council continue to be concerned that there is no clear context to justify or explain the contribution toward the housing market area shortfall. The Preferred Options gives greater degree of safeguarding to the LDC Green Belt, however the report does not give any substantive evidence arising from the Green Belt Review to which LDC has previously been committed to make. A clearer position on the Green Belt will assist in determining the future of the new settlement location. The postponement of a decision on location of new settlement is a significant omission. Welcome the distribution of homes. Welcomes the tenure balance.	Comments noted. The Preferred Options sets out the contribution to be provided to meet the established unmet need within the Greater Birmingham Housing Market Area. The Council has undertaken a Green Belt Review which forms part of the evidence base supporting the local plan. With regards to the new settlement no location is suggested within the document as sufficient evidence is not available to make such a proposal at this stage.
LPRPO837	Canal and River Trust	Chapter 15: Our healthy & safe communities	OHSC1: request that specific mention is made of the 39 kilometres of canal network available for recreation within this policy. Would like to be named as one of the partners that the Council will be working with to achieve these aims. Wording suggested.	Comments noted related to suggested wording for Policy OHSC1.
LPRPO838	Canal and River Trust	Policy ONR1: Green Belt	HS2 Route (Handsacre Link) is re-drawn to the south of Wood End Corner on the Trent & Mersey Canal and the Green Belt designation is moved south to correspond with the new railway forming the northern extent of the proposed Green Belt designation.	Support proposed change.
LPRPO839	Canal and River Trust	Policy ONR4: Green infrastructure and connectivity	Add canal to the list of initiatives that address evidenced connectivity strain through biodiversity offsetting and recovery mapping in paragraph 4 of this policy.	Comments noted relating to Policy ONR4.
LPRPO840	Canal and River Trust	Policy OBHE1: Historic environment	A significant part of the canal network provides non-designated heritage assets to the locality. Strategic Policy OBHE1: Historic environment does not refer to the canal network as a non-designated heritage asset. Wording suggested.	Comments noted regarding suggest wording for OBHE1.
LPRPO841	Canal and River Trust	Chapter 20: Larger service villages	Vision for Armitage and Handsacre: fully support and the inclusion of the Trent & Mersey Canal. Wish to be named as a partner in the delivery of Local Policy AH1 in the explanatory partner 20.15. Wording suggested.	Comments noted.
LPRPO842	Canal and River Trust	Policy A2: Alrewas Economy	Fully support.	Support noted.
LPRPO843	Canal and River Trust	Policy F2:Fazeley services and facilities	Support and wish to be partners in the drafting of any proposed enhancements to our network.	Support noted.
LPRPO844	Canal and River Trust	Policy FR1 : Fradley environment	Vision: canal network offers significantly more to existing and future communities than an active travel route, green blue infrastructure, sustainable travel resource for commuting and leisure, natural health service, ecological and biodiversity resource, tourism, heritage, water supply and transfer, renewable energy.	Comments noted.
LPRPO845	Canal and River Trust	Policy SHA3: Strategic housing allocation land north and south of Hay End Lane, Fradley	The full integration of the canal environment into the Strategic Housing Allocation at Fradley would better enable the provision of the physical, green and community infrastructure requirements, suggest adding a paragraph to specifically address the design issues relating to the canal environment, wording suggested. Need to consider both on and off-site considerations regarding the canal network - access by construction traffic and predicted traffic generation over historic canal bridges, listed structures, wording suggested.	Comments noted relating to Policy SHA3 and suggest wording regarding canal environment.
LPRPO846	Canal and River Trust	Policy FR1 : Fradley environment	Supports this aim but reiterate the relevance of the Trust's Towpath Design Guide to proposals on our network. Trust therefore wish to be named as a partner in the explanatory paragraph 20.38. Wording suggested.	Support noted.
LPRPO847	Canal and River Trust	Policy SHA4: Strategic housing allocation land of Huddlesford Lane	Need to consider the impact that construction traffic and predicted traffic generation on the safety for users and the structural implications for historic canal bridges in the vicinity of this allocation. Heritage assets need to be protected and retained with suitable mitigation and ensure that the bridges are not used by construction traffic. Wording suggested.	Comments noted.
LPRPO848	Canal and River Trust	Policy H3: Hopwas services and facilities	Local Policy H2: Hopwas Environment: Supports this aim but reiterate the relevance of the Trust's Towpath Design Guide to proposals on our network. Trust therefore wish to be named as a partner in the explanatory paragraph 20.38. Wording suggested.	Comments noted.
LPRPO849	Canal and River Trust	Glossary & abbreviations	Does not include a definition of a Listed Building, or a Heritage Asset. The definition of a Heritage Asset should include non-designated assets as the impact of proposals should be considered for the significance of all heritage assets.	Comments noted. Glossary to be reviewed.
LPRPO850	Canal and River Trust	Whole Document	The wording needs to be "should" cover, separate the list into two, namely "should cover as a minimum" and "where relevant should also include". Consider that the masterplan guidelines could be significantly expanded to encompass detailed on and off-site development provision requirements necessary as a result of proposed development.	Comments noted.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO851	Alrewas Parish Council	Whole document	<p>Parish council would support proposals to see LDC; work with other agencies to reduce the speed limit on the A38; increase local opportunities for employment to reduce longer commuting patterns; support the re-opening of a passenger train line between Lichfield and Burton. This could serve the NMA which would enhance its national profile.</p> <p>The proposal not to make the core of the village of Alrewas the location for any further major housing development is strongly supported by the Parish Council. However, it may support small schemes that encourage real affordable housing in the locality and types of housing which supports the needs of the local community.</p> <p>It is important that planning policies and pressures on housing numbers do not destroy the character of conservation areas and LDC should protect areas vigorously when considering planning applications.</p> <p>While not regarding Alrewas as a suitable for the development of major industry, the Parish Council supports the development of a strong economy within the district including the creation and support of a local employment opportunities. The Parish Council supports initiatives to increase the provision of infrastructure such as high speed broadband.</p> <p>Proposals which can enhance facilities for younger members of the community would be supported by the Parish Council. Given the profile of the local population LDC is encouraged to work with local and national agencies to support the provision of healthcare. As part of the move to a healthier population LDC should work to encourage residents to participate in events for fitness and support and protect open spaces, cycle routes. LDC should continue to focus the reduction of its environmental impact. An appropriate range of publicly run and private facilities should be encouraged across the district</p> <p>The Parish Council expects LDC to maintain and enhance its policies, procedures and standards of operation to ensure that it provides the best possible service to its district, following the highest standards of public service. It should always maintain an experienced and well-trained staffing base to ensure that its core functions are effective, resilient, responsive and meet the needs of the district.</p> <p>LDC should continue to work with public and private providers and businesses and industry to ensure that relevant educational facilities for the whole population are available.</p>	Comments noted. Preferred options document includes policies to encourage economic development across the district. Policies also seek to encourage and promote healthy and safe lifestyles.
LPRPO852	P Harris (Cerdea Planning) for Piper Homes	Policy OSS2:Our Spatial Strategy	Does not explicitly acknowledge that the contribution Lichfield will be making to the GBBCHMA shortfall is based on the latest evidence, it is reasonable to assume that given the publication (November 2019) of the PO predates the publication of the latest Black Country Urban capacity review, the contribution which Lichfield district makes to the shortfall should grow proportionately to some 5,175 homes. Consider more appropriate to allocate a level of growth within the parts of Lichfield district which are closest to those conurbation. Surprising that no allocations are made for Little Aston which, in spatial terms adjoins Birmingham City and Walsall Metropolitan Borough and, in hierarchy terms, ranks in the council's third most sustainable tier. Indeed, it is noted that Little Aston is the only Tier 3 settlement within the council's identified hierarchy which is either not identified for any growth in this emerging review or has not been subject to any identified growth in the adopted Local Plan Strategy or Local Plan Allocations document. As an evidentially sustainable settlement which spatially is the best placed settlement in the district to accommodate the shortfall arising out of the GBBCHMA, clients land at NE wick Avenue suggested.	Comments noted. The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period.
LPRPO853	P Harris (Cerdea Planning) for Piper Homes	Policy OHF1: Housing Provision	Table 13.1 incorrectly drafted. Total, at 11,618 homes is almost 200 homes short of the council's stated minimum need of 11,800. It is unclear how the remainder are to be delivered. Too great a gap to be made up by windfall development. Great concern that leaving the delivery of at least 850 homes to the Neighbourhood Plan (NP) process. Could be resolved by allocations in a further Allocations Document, this creates further uncertainty and raises question marks over delivery timescales. needs redrafting to ensure that the delivery of the homes presently identified for allocation through the NP process is done instead through the Local Plan review. The quantum of allocations should be much closer to the identified minimum need having full regard to the requirement to increase the contribution towards the GBBCHMA overspill. Redraft to include a specific allocation for Little Aston. Concerned about the plan's reliance on land to the north east of Lichfield to accommodate 3,300 homes, some 60% of the of the identified commitments which are new to the Local Plan Review. It is unclear how such a large community in what is at the present time an inherently unsustainable location with poor road and public transport infrastructure could be accessed. Insufficient evidence available at this time to commit the Spatial Strategy to an urban extension of this scale. The distribution of homes as set out within both Policies OHF1 and OSS2 should be revised to reduce the disproportionate reliance on Lichfield to accommodate the bulk of the District's housing need and allocations will be identified through the Local Plan Review (not NPs) in the Level 1, 2 and 3 settlements including Little Aston.	Comments noted. Policy SHA1 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO854	P Harris (Cerdea Planning) for Piper Homes	Whole document	Green Belt Review: Assessment of Site LA1 is misplaced consider the overall score should be Minor. Housing Site Selection paper : not understood how the site 128 scores 'red' against the contribution towards the spatial strategy as contend parcel LA1 makes a minor contribution to the strategic purposes, no reason why any veteran, mature or protected trees would represent a significant constraint to development located as they are within the field margins, site should not have been discounted for housing development. With a corrected assessment it scores at least as well if not better than the site at Huddlesford Lane, Whittington (Ref 115) which has received an allocation for 80 homes. No substantive reasons why client's site 128 could not come forward in whole or in part for housing development and we assert that the Little Aston settlement boundary should be redrawn accordingly and an allocation made.	Comments noted relating to Green Belt Review.
LPRPO855	K Ventham (Barton Willmore) for Curborough North	Chapter 8: Our strategic objectives & priorities	Broadly supported. Consider growth at Lichfield should be included within Priority 1.	Support noted.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO856	Sarah Morris	Policy ONR1: Green Belt	Oppose the release of Green Belt off Coulter Lane on the grounds that there has not been enough analysis into traffic generation, improvements to the environmental quality and accessibility of the remaining Green Belt land, habitat creation, improved access and availability to public transport and other necessary infrastructure changes. She asks whether there are sufficient brownfield sites that can be used instead to meet housing need. Objects to this policy.	Comments noted. The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO857	K Ventham (Barton Willmore) for Curborough North	Policy OSS2: Our spatial strategy	Broadly support the Council's Spatial Strategy to locate development in the most sustainable areas and utilise existing infrastructure and services. Lichfield is identified as the most sustainable (Level 1 – Strategic Centre) settlement and the Council rightly confirm this includes Streethay. Consider should be extended to include 'Streethay and Curborough' to encompass the Council's emerging strategy. It is considered that the assumption set out within the HEDNA (0.1% and 0.3% growth per annum) is too low in the context of historic job growth levels over the past 30 years, it is questionable whether the LPR's use of the standard method minimum need truly reflects the housing need required to support the Council's clear economic growth aspirations. Consider the Council should reconsider their evidence and assumptions with a view to planning for additional houses within the District to accommodate the Strategy and unmet needs arising and should take the lack of potential previously developed land into account when considering their strategy.	Comments and areas of support noted.
LPRPO858	K Ventham (Barton Willmore) for Curborough North	Policy NS1: New Settlement	Consider that further information should be provided. Ensure that sufficient development is planned for within this Plan Period and that future plans for a new settlement to meet an as yet unknown need, do not impact upon this and delay the LPR coming forward.	Comments noted
LPRPO859	K Ventham (Barton Willmore) for Curborough North	Policy OSC1: Securing sustainable development	Ensure that any requirements relating to this policy are justified and evidenced and will not impact upon the viability of developments. Any contributions should be held within the policy and not a SPD. Site at North East Lichfield is well placed to deliver development which takes into account these issues and provide a sustainable form of development. Development of this scale presents opportunities to embed sustainability principles during both construction and operational phases. Such principles will result in holistic, win-win solutions for not only climate change but health & wellbeing, the natural environment and the economy. A critical mass of development could allow key principles to be carried forward as part of a flexible energy strategy. Principles suggested. Technology, quantification and assessment methodologies are constantly evolving as the climate is also changing. Given the scale of development and phased construction programme, the climate strategy will necessarily be a live document that will adapt and become more detailed as the design progresses.	Comments noted relating to Policy OSC1.
LPRPO860	K Ventham (Barton Willmore) for Curborough North	Policy OSC2: Renewables and Low Carbon Energy	Amend to clarify that the inclusion of such infrastructure is not a requirement of schemes but something which will be supported.	Comments noted.
LPRPO861	K Ventham (Barton Willmore) for Curborough North	Policy OSC3: Sustainable building standards for non-domestic buildings	Ensure that any policy requirement is considered as part of the Local Plan viability assessment and does not impede the ability to bring forward much needed development.	Comments noted.
LPRPO862	K Ventham (Barton Willmore) for Curborough North	Policy OSC4: High Quality Design	Requirement to 'clearly and convincingly' demonstrate that development will have a positive impact upon design is beyond the requirements of the NPPF and should be reworded. Elements would be better placed within a specific policy e.g. energy efficiency and renewable energy and the requirement to consider the reclamation, re-use and recycling of construction materials. The viability of achieving any standards that may also exceed Building Regulations requirements should be taken into consideration. Any requirement for exceedance should be evidenced and justified. Site at North East Lichfield is well placed to provide a master planned development which constitutes high quality design.	Comments noted.
LPRPO863	K Ventham (Barton Willmore) for Curborough North	Chapter 10: Our sustainable communities	OSC5: Flood Risk -Amend to clarify that flood risk assessments will only be required where directed by national policy.	Comments noted.
LPRPO864	David Wilson Homes (Martin Marais)	Chapter 13: Our homes for the future	<p>There are two few new homes planned for within the plan period and the council should have consideration to whether 11,800 new homes will genuinely meet both its own needs and the shortfall contribution. There is an over reliance on a single large allocation. 60% of the housing growth is to be delivered around Lichfield, it is astonishing that of the new allocations 2,300 of new homes are expected to come from a single allocation north-east of Lichfield. Such a restrictive reliance to a single development is bound to make the Council vulnerable to not meeting its housing needs. Consider the proposed allocation north-east of Lichfield will only deliver 1,000 dwellings within the plan period.</p> <p>The delivery of new homes has consistently failed to meet trajectories set out within the councils five year housing supply reports. The Council must give serious consideration of where it can genuinely and realistically deliver the homes it needs by restricting the delivery of homes to a few large allocations. Consider the focus of Policy OHF1 is flawed and council must give consideration as to whether the policy will facilitate the delivery of the number of new homes. Do not consider the Council can demonstrate a five year supply of land.</p> <p>Consider proposed distribution of housing provision should be more dispersed. By dispersing these new homes across a greater number of settlements the chances of getting them delivered will improve significantly. Unfortunately Burntwood is significantly constrained, but should be asked to take more than the current 400 homes. The key rural settlements should contribute more than the current 30%, 40 to 45% would not be unreasonable. This means a large number of other rural settlements should be required to contribute above 20% to the housing need. This would average only 70 to 75 new homes per settlement. Council must give consideration whether a more dispersed distribution of allocations including areas associated with other rural villages is not a more appropriate mechanism for ensuring the delivery of homes.</p>	<p>The housing requirement is based upon the local housing need (LHN) established via the standard methodology within the planning practice guidance plus a contribution of 4,500 dwellings to meet unmet need.</p> <p>Spatial strategy seeks to focus a proportion of development to Lichfield. The plan includes four strategic allocations along with a number of existing non-strategic allocations as set out at Appendix A.</p>

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO865	K Ventham (Barton Willmore) for Curborough North	Chapter 12: Our sustainable transport	OST1: Our Sustainable Transport and OST 2. support.	Support noted.
LPRPO866	K Ventham (Barton Willmore) for Curborough North	Policy OHF1: Housing Provision	While noting our comments relating to the potential to plan for more development within the District to meet economic aspirations and accommodate the wider HMA need, we broadly support the Council's overall strategic approach. The draft Policy should make clear that the number of dwellings proposed within the strategic development allocations are minimums. Wording suggested. Table 3.1 does not sum.	Support noted. Suggest wording noted.
LPRPO867	K Ventham (Barton Willmore) for Curborough North	Chapter 13: Our Homes for the future	OHF2: Providing a balanced housing market and optimising housing density -flexibility is welcomed. Should clarify within the draft Policy that any schemes that are broadly in line with the mix are considered policy compliant. Consider that a blanket-density requirement covering the district will not promote high-quality design that reflects the character of the area. Consider that a design brief exercise is suitable for the strategic development sites and density should be considered as part of this process. Support the Council's acknowledgement at Paragraph 13.13 that there is insufficient support to require a portion of allocations to accommodate self-build.	Comments noted.
LPRPO868	K Ventham (Barton Willmore) for Curborough North	Policy OHF4: Affordable Housing	Reserve the right to comment on the rate of affordable in more detail at the appropriate time, viability work should consider all contributions that would be required as part of the LPR.	Comments noted. Evidence within the HEDNA suggests the Council will be justified in seeking to achieve as much affordable housing as viably possible on appropriate development sites. Further viability evidence is being collected which will inform the policy and provide a clear position in terms of the appropriate level of affordable housing to be sought.
LPRPO869	K Ventham (Barton Willmore) for Curborough North	Chapter 14: Our economic growth, enterprise & tourism	OEET1: Our employment and economic development - To create a sustainable development, the Site at North East Lichfield could provide an element of employment floor space within the mixed use local centres which total 3.9ha. Amend the policy to reflect that large-scale mixed-use development can include employment provision, where appropriate, even though they lie outside of the designated employment areas.	Comments noted. Existing allocated employment areas are identified on the policies maps which accompanied the Preferred Options document. Current evidence suggests there are limited additional options for locating employment growth.
LPRPO870	K Ventham (Barton Willmore) for Curborough North	Policy OHSC1: Our healthy & safe communities	Support. The Site at North East Lichfield is well placed to provide for local education and health needs. HIA required for any proposals of more than 100 dwellings.	Support noted.
LPRPO871	K Ventham (Barton Willmore) for Curborough North	Policy OSR2: Open space and recreation	Allocation at North East Lichfield will provide significant open space which can be utilised by both existing and future residents. Quantum and quality of the green infrastructure proposed on the scheme at The Lakes at Watery Lane demonstrates IM Land's commitment to high quality open space provision.	Comments noted.
LPRPO872	K Ventham (Barton Willmore) for Curborough North	Policy ONR1: Green Belt	The creation of a new area of Green Belt to the north of Lichfield, covering the area between the proposed route of HS2 and the LNWR line outside of the consented Watery Lane area and draft North East Lichfield allocation. This would result in a large area of Green Belt to the north of Lichfield, forming a continuation to that west of the LNWR, and a thin strip of between circa 80 and 400m, but generally of 100m in width. This latter strip will be situated between the proposed draft allocation at North East Lichfield and the proposed route of HS2. This latter area is not appropriate for Green Belt will not serve any of the purposes set out in paragraph 134. Further, it has not been demonstrated how other local policies would not be appropriate for this area not accord with NPPF. Should HS2 not be constructed, there will be no defensible boundary to the proposed Green Belt in this area, instead comprising an arbitrary line on the ground not marked by physical features. This would be in contravention of the NPPF.	Comments noted. Green Belt Review 2019 makes clear that 'exceptional circumstances' would need to be demonstrated if changes to the Green Belt boundary are proposed. This has been judged to be the case in the preferred options document as stated at paragraph 16.5 in terms of meeting development needs and the identification of new Green Belt to the north of Lichfield City.
LPRPO873	K Ventham (Barton Willmore) for Curborough North	Policy OBHE1: Historic environment	No reference within the NPPF to 'enhancing' heritage assets so Policy should be amended. Policies relating to conservation and heritage matters duplicate the requirements of the NPPF. For the sake of brevity these could be reduced.	Comments noted relating to heritage assets.
LPRPO874	K Ventham (Barton Willmore) for Curborough North	Policy SHA1: Strategic housing allocation North of Lichfield	Support allocation and provision of a master plan, could be further strengthened to require a design brief is created in relation to the Site to ensure the highest standard of design and provide greater certainty as to the location and delivery of infrastructure. Amend boundary to align with the submitted information. Northern area of the allocation also inserts slightly into land within the HS2 Bill limits and this should be amended. Finally, the draft Policies Map uses an outdated version of the HS2 alignment and the most up to date version should be used. Additional information submitted to show how proposed scheme complies with the requirements of the draft policy.	Comments noted.
LPRPO875	R Sanderson	Policy SHA2: Strategic housing allocation land west of Fazeley	Object to Policy SHA2 and the proposed allocation on the following grounds: 1) Allocated site is not in a sustainable location and is a considerable distance from the services and facilities within the settlement. Previous Rural Planning Project evidence recommended: 'Avoid extensions of village that will result in an elongation of its physical form and be distant from villages services and facilities' the proposed allocation would be contrary to that recommendation. 2) If the development delivers facilities and services they would not be well located to enable easy access for the greater part of the existing community, a more central location e.g. near the hospital would be more effective in that respect. 3) Green belt Review considers site as being of moderate importance overall and playing an important role in safeguarding the countryside from development. Remainder of site was not assessed in the Green Belt Review. Sutton Road currently provides a permeant and clear boundary to the built up area. 4) Impact on local highway network - there are already considerable delays in the area at peak times. These problems would be significantly worse if the allocated site was to be developed. In conclusion I do not consider that the proposed allocation is in an accessible or sustainable location and its development would do little for the community. The scale of development opposed is disproportionate to the size of the settlement.	Comments noted. Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Rural planning report was prepared in support of the existing adopted Local Plan, the evidence was published in 2011. The Green Belt Review provides a comprehensive review of all parcels and areas of the Green Belt. These parcels and areas are not 'sites' and are defined using the methodology set out within the Green Belt Review.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO876	Jeff Hateley	Policy OSS2:Our spatial strategy	Opposes the release of Green Belt land to meet the needs of the Birmingham and Black Country housing market area, particularly in relation to the land at Mile Oak (SHA2). The figure of 4500 is higher than it needs to be and needs reducing. Feels that the policy stating that the 'important role of the greenbelt will be recognised and protected' is contradicted by the mile oak proposal. Questions why this is not being given the same protection as other areas and asks if it is because it is closer to Tamworth than Lichfield.	Comments noted. Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. The Preferred Options document sets the spatial distribution of growth, including strategic housing allocations and housing requirements for settlements and levels of the settlement hierarchy. The preferred options includes a proposal to identify new Green Belt to the north of Lichfield City within the gap between Lichfield and Fradley.
LPRPO877	K Ventham (Barton Willmore) for Curborough South	Chapter 8: Our strategic objectives and priorities	Broadly supported. Consider growth at Lichfield should be included within Priority 1.	Support noted
LPRPO878	David Pickford (Pegasus Group) on behalf of Daniel Wright	Chapter 7: Our vision & Chapter 8: Our strategic objectives and priorities	<p>Vision is broadly supported however the vision contains a statement regarding the new settlement which states that it will be "creating a community that will be a place where families will aspire to live." This is supported in principle however this should apply to the entire District rather than just the new settlement to reflect the need for a balanced spatial strategy. The reference to the Council's "intention to focus our long-term growth in a new settlement," it should be made clear that this long-term growth relates to a contribution to growth beyond the plan period.</p> <p>The statement that "the Council has an aspiration to deliver housing and employment growth within our district" should be strengthened to state there is a clear commitment to delivering housing and employment growth in line with determined growth requirements. The development plan should provide certainty of delivery.</p> <p>Paragraph 7.4 it is stated that the Council does not consider it necessary for the Vision to make specific reference to meeting the unmet housing needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). Unclear how the Council reached this view and considers this reference should be included in the Vision to demonstrate commitment to the statutory Duty to Co-operate.</p> <p>Approach to Strategic Objectives and Priorities is generally supported. Strategic Objective & Priority 1 'Sustainable Communities' is not clear as currently drafted. It makes reference to growth in a number of larger service village settlements and refers to the delivery of homes with supporting infrastructure in "our large settlements." The term 'large settlements' is open to interpretation and it is not clear how this relates to the identified settlement hierarchy. Contended that the objective should relate back to the preferred option for growth set out in the 'Preferred Options and Policy Directions' document, recognising that proportionate growth, in line with the settlement hierarchy will consolidate sustainable communities across the District.</p> <p>Strategic Objective 6 could be strengthened to refer to meeting the unmet housing needs of the wider GBBCHMA which includes Lichfield District.</p> <p>Local Plan would benefit from clearer referencing and linking throughout to demonstrate how the spatial strategy related back to the Vision, Strategic Objectives and Priorities. Currently there is a lack of detail which is needed to demonstrate the viability and deliverability of the strategy and robust evidence produced to enable meaningful engagement to ensure a sound plan.</p>	Comments noted
LPRPO879	David Pickford (Pegasus Group) on behalf of Daniel Wright	Policy OSS2: Our Spatial Strategy	<p>The approach of delivering Lichfield District's objectively assessed need as a minimum figure in line with the standard method is generally supported.</p> <p>Pro-active approach taken towards GBBCHMA shortfall is welcomed however it is not clear how the figure of 4,500 dwellings has been identified. The GBBCHMA Strategic Growth Study identified locations for urban extensions and new settlements. None of these individually or combined result in the provision of 4,500 dwellings. Therefore it should be clarified in Policy OSS2 how the figure of 4,500 dwellings has been derived. South Staffordshire District Council and Cannock Chase District Council are both taking a similar approach and testing a contribution based upon the minimum levels of growth implied by the strategic areas of search identified within their areas in the Strategic Growth Study. If LDC were to take this consistent approach the following contribution towards meeting the GBBCHMA shortfall would need to be taken: 20,000 dwellings in respect of the new settlement recommended areas of search, 6,000 dwellings in respect of the sustainable urban extensions recommended areas of search and additional growth in terms of 'proportionate dispersal' as recommended by the Strategic Growth study. The LPR should consider the Areas of Search identified in the Strategic Growth Study and where options have not been pursued, clearly set out the evidence and reason for this. The hierarchy set out in the policy is supported by the Settlement Sustainability Study (October 2018) and is supported.</p> <p>The policy sets out the proposed areas for growth which will be focused on a number of strategic allocations within Lichfield City, Fradley, Fazeley and Whittington. However, these proposed strategic allocations do not align with the settlement hierarchy set out within this policy as Burntwood is afforded no strategic allocation despite it being identified as the single Level 2 settlement, behind only Lichfield City.</p> <p>In addition, only three of the seven settlements listed in Level 3 are afforded new allocations of growth. Contended that Policy OSS2 is not justified and does not provide a considered and justified spatial strategy. References to specific allocations should be removed from this policy and Table 3.1 Overall Distribution of New Homes should be included in place of this as this sets out where all growth will be directed, not just that which relates to proposed strategic allocations.</p>	Comments noted. Housing requirement is based upon the established Local Housing Need (LHN) and contribution considered appropriate to assist in meeting unmet needs. Strategic allocations and housing requirements established seek to align with the spatial strategy and settlement hierarchy.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO880	David Pickford (Pegasus Group) on behalf of Daniel Wright	Policy NS1: New settlement	<p>Acknowledged that in accordance with the Strategic Growth Study, the Council have indicated its support for a new settlement of around 10,000 dwellings within the District. Agrees that any new settlement would not deliver homes within the next 15 years and therefore cannot be relied upon as a potential source of supply in this Plan.</p> <p>Considers it unlikely that a 10,000 dwelling new settlement will start delivering housing by 2040 if the location is not yet known. The Strategic Growth Study acknowledged that there is significant lead in time to delivery of large strategic sites.</p>	Commented noted
LPRPO881	David Pickford (Pegasus Group) on behalf of Daniel Wright	Chapter 10: Our Sustainable Communities	<p>Approach to sustainable development, set out in Policy OSC1, is generally supported where it is consistent with national policy. Policy wording in relation to air quality states that "no decline in standards being deemed acceptable as a result of new development." This wording is not clear and it is suggested should be clarified that its intention is that new development should not cause air quality standards to be exceeded.</p> <p>Approach to securing high quality design as set out in Policy OSC4 is generally supported however should be updated to reflect national design policy guidance. It is noted that masterplans are required for strategic developments (defined as over 100 dwellings) only. This approach is supported.</p>	Comments noted. Wording relating to air quality to be reviewed.
LPRPO882	David Pickford (Pegasus Group) on behalf of Daniel Wright	Policy INF1: Delivering Our Infrastructure	<p>Draft policy is supported however it is considered there needs to be additional evidence published in support of the Local Plan Review regarding infrastructure in order to provide clarity over what additional infrastructure is required to support the Local Plan Review allocations and how this will be delivered.</p> <p>Should include an update to the Infrastructure Delivery Plan (IDP) and further consultation with the County Council and other relevant consultees on matters such as highways modelling and education provision. The National Planning Practice Guidance (NPPG) on viability is clear that the drafting of plan policies should be informed by engagement with developers, landowners and infrastructure and affordable housing providers.</p>	Comments noted. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO883	David Pickford (Pegasus Group) on behalf of Daniel Wright	Chapter 12: Our Sustainable Transport	<p>Approach to sustainable transport is broadly supported. However, the requirement for all major development proposals to produce a travel plan is too onerous for smaller developments as it would apply to all developments over 10 dwellings. Considers the threshold should be revised to a higher level.</p> <p>Noted that parking provision will continue to be determined with reference to the Sustainable Development Supplementary Planning Document (SPD). This is not in line with national policy which states that maximum parking standards should only be set where there is clear and compelling justification that they are necessary for managing the local road network or for optimising density of developments in centres or areas well served by public transport. This justification has not been clearly provided. It is noted that the policy provides greater flexibility for the provision of parking to be considered for specific development proposals and this is supported.</p>	Comments noted
LPRPO884	David Pickford (Pegasus Group) on behalf of Daniel Wright	Policy OHF1: Housing Provision	<p>There are four strategic development allocations/ areas listed in the policy alongside approximate numbers of new homes they will deliver. However, it is not clear how the proposed allocations relate to the spatial strategy policy and settlement hierarchy and the approach seems rather 'ad hoc' and has not been justified. Additionally no reasoning which explains the inconsistency with the current adopted spatial strategy.</p> <p>Proposed levels of growth vary significantly between settlements including those at the same level in the hierarchy. Unclear how the strategy has led to this and reasoning needs to be demonstrated and justified along with details relating to those settlements which have been missed out.</p> <p>Not clear how 'strategic allocations' have been defined. This is of particular importance as the Council is currently proposing that non-strategic levels of growth are to be dealt with through allocations within the Neighbourhood Plans process. The range of proposed strategic allocations spans from 75 - 3,300 dwellings. It needs to be clarified what the maximum threshold for a non-strategic allocation would be, with reference to the proposed strategic allocations, to show reasoning 'in the round'.</p> <p>Approach of leaving the allocation of 'non-strategic' sites to Neighbourhood Plans is not supported. Approach is not consistent with national policy. Policy OHF1 should reflect paragraph 65 of the NPPF in that the housing requirement figures should reflect the overall strategy for the pattern and scale of development and any relevant allocations. Would be helpful to assign rural parishes included in the 'wider rural area' or given the whole district is parished, assign a minimum requirement figure for each parish.</p> <p>Local Plan is also required to provide certainty on where growth will be delivered in order to ensure alignment of infrastructure delivery. This needs broad locations of growth to be identified so that infrastructure needs can be planned for. This should be via an updated Infrastructure Delivery Plan or equivalent document.</p> <p>Supporting text states that the Council will 'make provision for' at least 11,800 dwellings between 2018-2040, wording should be strengthened to 'will deliver'. The total housing allocations identified provide 11,568 dwellings it should be clarified in supporting text if the balance (232 dwellings) is to be made up via windfall developments and how these assumptions have been arrived at.</p> <p>The current strategy is heavily reliant on a single large site to deliver the overall housing requirement (Land North East of Lichfield), this is not supported by detailed evidence to show work has progressed sufficiently to demonstrate deliverability of these during the plan period.</p>	<p>Comments noted. Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.</p> <p>A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.</p> <p>The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.</p>

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO885	David Pickford (Pegasus Group) on behalf of Daniel Wright	Policy OHF2: Providing a Balanced Housing Market and Optimising Housing Density	<p>Concerned that in its current form Policy OHF2, by referring to specific percentage figures, the plan lacks sufficient flexibility to meet changing housing needs across the District and the Plan period. Submitted that the most appropriate approach to housing mix is to continue to be guided by market signals, as defined with the most up-to-date Strategic Housing Market Assessment (SHMA).</p> <p>Acknowledged that the Council has produced a Housing and Economic Development Needs Assessment (HEDNA) which does consider housing needs and could be referred to in this policy. However, it is not clear from the HEDNA how the housing mix has been derived using detailed local evidence in line with the requirements set out in the National Planning Policy Guidance (NPPG) on how to produce a HEDNA. This should be clarified in the document.</p> <p>Policy lacks flexibility to reflect differences across sub-market areas; changing needs over plan period and site-specific considerations which will influence mix that can be delivered on individual sites. Plan proposes 4,500 additional homes to meet the needs of GBBCHMA. Housing needs of neighbouring authorities will be of consideration in determining housing mix on developments.</p> <p>Policy sets out minimum net density of 35 dwellings per hectare, considered to be broadly appropriate. Developments in Lichfield City, Burntwood and other locations with good public transport will be expected to achieve higher densities of approx. 50 dwellings per hectare.</p> <p>Suggested that an amendment to the policy to focus this higher level of density upon centres, with more flexibility to the wider urban areas (see NPPF paragraph 123 a) would be a more sensible approach.</p>	Comments noted. Proposed policy OHF2 seeks to deliver a mix of dwellings to meet the needs of the District's demographic including provision of starter and affordable homes and smaller homes. Evidence in relation to viability and the level of a affordable homes to be required is being collected
LPRPO886	David Pickford (Pegasus Group) on behalf of Daniel Wright	Policy OHF4: Affordable housing	<p>Lack of specific affordable housing threshold in the policy does not accord with the NPPF or PPG. National policy requires a Local Plan to set an affordable housing percentage which should be subject to viability testing to confirm an appropriate figure. National policy clearly requires a Local Plan to set an affordable housing requirement which this policy currently lacks. The policy should be amended to state an affordable housing percentage requirement. This should be subject to viability testing to confirm an appropriate figure.</p> <p>Policy seeks to allow flexibility in the tenure, size and type of affordable housing on a scheme by scheme basis. This flexibility is supported and should be delivered with reference to the most up to date SHMA. The initial viability evidence indicated that 0%, 20%, 30% and 40% would be tested on major development sites. This evidence has determined that a figure of 40% is unlikely to be viable.</p>	Comments noted. Evidence within the HEDNA suggests the Council will be justified in seeking to achieve as much affordable housing as viably possible on appropriate development sites. Further viability evidence is being collected which will inform the policy and provide a clear position in terms of the appropriate level of affordable housing to be sought.
LPRPO887	David Pickford (Pegasus Group) on behalf of Daniel Wright	Policy OEET1: Our employment and economic development	<p>Policy OEET1 states that approximately 61 hectares of land will be allocated for employment use in accordance with the Housing and Economic Development Needs Assessment 2019. It is not clear why the current consultation document has not identified any employment sites and it should be clarified how the Council intends to deliver its employment land needs.</p> <p>Council's aspirations for economic growth are welcomed as part of a balanced sustainable strategy.</p>	Comments noted
LPRPO888	David Pickford (Pegasus Group) on behalf of Daniel Wright	Chapter 15: Our healthy and Safe Communities	<p>Approach to healthy and safe communities in Policy OSHC1 is generally supported.</p> <p>However, the policy states that health and education infrastructure requirements related to strategic development proposals will need to be understood and determined through the Local Plan and accompanying evidence base so that it is clearly demonstrated that the strategic allocations are deliverable. Infrastructure requirements for strategic sites will also need to be considered by the viability process which national policy requires to be considered through the Local Plan. Further work is needed on the evidence base and in relation to viability testing regarding infrastructure.</p> <p>It would be clearer to separate these concerns into separate policies.</p>	Comments noted. The Local Plan Review includes policies on infrastructure provision which will seek to ensure appropriate infrastructure is provided across the District. The Council will continue to engage with infrastructure providers through the local plan review process.
LPRPO889	David Pickford (Pegasus Group) on behalf of Daniel Wright	Policy ONR1: Green Belt	<p>There is an acceptance by the District Council that there needs to be changes to the Green Belt boundary at Whittington and Fazeley to accommodate growth requirements to 2040. This is a start but not sufficient. Green Belt release needs to be made to deliver a sustainable spatial strategy delivering a range of sites in a variety of locations. This should include smaller villages.</p> <p>There is an acceptance by the District Council that there needs to be changes to the Green Belt boundary to accommodate growth requirements to 2040. This recognition is welcomed and it is clear that the Council has started to produce the exceptional circumstances justification for such a release, but this needs to be supported by further evidence.</p> <p>Policy seeks to propose new Green Belt land to define the northern extent of Lichfield City and prevent the coalescence of Lichfield and Fradley. NPPF is clear that any new proposals for Green Belts should only be established in exceptional circumstances and be set out in strategic policies. It needs to be demonstrated that the proposed new Green Belt between Lichfield and Fradley meets the test.</p> <p>Policy acknowledges that further 'non-strategic' changes to the Green Belt may be appropriate, but boundaries will be determined through Neighbourhood Plans or the allocations document. This approach is not appropriate because it is important that Green Belt release is addressed now as it contributes to the overall strategy and sustainability of the District and settlements. It is not clear whether there actually will be an allocations document or whether this is a full local plan.</p>	<p>Comments noted. The Preferred Options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.</p> <p>Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice</p>

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO890	David Pickford (Pegasus Group) on behalf of Daniel Wright	Chapter 16: Our Natural Resources	<p>Approach to habitats and biodiversity set out within Policy ONR2 is generally supported where it is consistent with national policy. Draft policy continues to include biodiversity net gain requirement, supporting text clarifies this will be assessed through Natural England's biodiversity metric. The Government intends to publish standardised guidance on this so policy wording should be amended to include future documents.</p> <p>Policy ONR5 addresses natural and historic landscape, in the District there is one area of landscape which is nationally valued; Cannock Chase Area of Outstanding Natural Beauty (AONB). Policy focuses on the AONB but also references the West Midlands Green Belt. Contends that Green Belt is not a landscape designation and therefore isn't clear why this policy makes reference to the Green Belt. Any policy text regarding beneficial use of Green Belt should logically be included in the Green Belt Policy.</p>	Support noted. Wording relating to Policy ONR5 to be reviewed.
LPRPO891	David Pickford (Pegasus Group) on behalf of Daniel Wright	Policy SHA1: Strategic housing north of Lichfield	<p>SHA1 proposes 3,300 new dwellings between two housing allocations; Land North East of Watery Lane and Land at Streethay. Development has started on the Streethay allocation it has not commenced on the Watery Lane site. Given that outline consent was granted in February 2017 and RM permissions for the spine road and green infrastructure was only granted in August 2019. The Council will need to be satisfied that here are no underlying issues preventing delivery of this new wider allocation. There needs to be clear evidence this site is deliverable within suitable timescales and at proposed numbers.</p> <p>Councils housing trajectory needs to clearly consider the impacts of allocating approx. 70% of the proposed dwellings allocated through this plan to a single site that will deliver later in the plan period, including the risk of delays.</p> <p>Proposed allocation North of Lichfield is poorly connected to the rest of the City and is reliant on only two principal connecting roads. Existing railway line separates the proposed allocation from the rest of the City, will pose a challenge to create a sustainable community which integrates with existing residents.</p> <p>Lack of evidence that local infrastructure can be viably upgraded to accommodate a development of the scale proposed. Significant work is needed to upgrade local and strategic (A38) highway network along with schools and healthcare infrastructure. Significant input from County Council, Highways England and other stakeholders to ensure relevant modelling is undertaken to test the allocation and identify is required infrastructure can be delivered. Absence of evidence highlights questions over the deliverability of the proposed allocation.</p> <p>Suggested that the Council's requirement should be spread across a number of sites of differing scales and across all sustainable settlements rather than concentrating the majority of growth to within a single large allocation in this locations. This approach would provide greater flexibility and deliverability, in line with the NPPF.</p>	Comments noted. Policy SHA1 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO892	David Pickford (Pegasus Group) on behalf of Daniel Wright	Whole Document & Sustainability Appraisal	<p>SA document needs to provide further narrative to explain how the spatial strategy and associated allocations were selected over reasonable alternatives. It set out at Section 2.4 that the spatial strategy reflects a combination of Residential Growth Options 2 and 4 and Employment Growth Option 1, but no clear narrative explaining how selections were made. There is also no explanation of how 4,500 dwellings contribution towards the GBBCHMA shortfall has been determined.</p> <p>Paragraph 2.6.3 confirms no employment sites are identified at the Preferred Options stage, it is unclear why this is and effectively results in the implementation of the 'do nothing' approach to employment. This should be justified in the SA.</p> <p>SA discusses the site selection methodology for residential sites, which has led to the identification of four strategic allocations. As discussed above, this does not represent a sustainable balanced strategy, and this is not clearly justified by the SA.</p> <p>It is noted that sites that are not deemed to be strategic in nature are excluded from the assessment. However, the cumulative impact of non-strategic sites can contribute towards a sustainable, balanced strategy and therefore does form a reasonable alternative which should be included and considered by the SA.</p> <p>When assessing the long-term effects in Section 2.8, the assumption was made that mitigation measures have been proposed that these have been applied. Helpful if this section clarified what the mitigation measures are and who has proposed them.</p> <p>The key national plans, policies and programmes fails to make reference to the government policies regarding delivery of homes, with the NPPF reiterating the Government's objective of significantly boosting the supply of homes (Paragraph 59). This is key consideration in the drafting of the Plan and the accompanying SA and should be included.</p> <p>Section 4 needs to clearly justify how the preferred spatial option has been arrived at having regard to all 'reasonable' alternatives. It should also justify how the 4,500 dwelling contribution towards the GBBCHMA has been derived. The identification of new strategic allocations is supported however this needs to form part of a balanced strategy. The proposed allocations are focused on Lichfield and other larger service villages: Fradley; Fazeley; and, Whittington. The inclusion of allocations at four settlements does not represent a balanced strategy. This does not align with Strategic Policy OSS2 (as set out at paragraph 2.4.7) which states new growth/development will be directed to the most sustainable locations via a hierarchy of centres and settlements. The proposal to allocate sites in four settlements does not align with this aim.</p>	Comments noted

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO893	David Pickford (Pegasus Group) on behalf of Daniel Wright	Whole document	<p>Promoting a 0.9ha site to the eastern edge of Upper Longdon. Accompanied by a site plan and promotional document.</p> <p>Site lies within Green Belt and is not within CCSAC or AONB.</p> <p>It is clear from the Longdon Neighbourhood Plan that there is support for small-scale well-designed development within the main settlements of the Parish including Upper Longdon.</p> <p>Policy OSS2 places Upper Longdon in the Tier 5 category of the settlement hierarchy, however Policy OHF1 does not reflect this. Policy restricts development with allowable exceptions - this policy is not considered deliverable.</p> <p>Site falls within the Green Belt and is identified as Parcel UL1 in the Green Belt Review - conclusion to Purpose 2 is contested as the inclusion of all the settlements in the District in the definition of 'towns' changes the emphases of national policy. Parcel has no role in this regard. Contends that the site plays a minor role in terms of Green Belt purpose.</p> <p>Considered that the plan as currently proposed is far too heavily dependent upon the delivery of a large strategic site.</p> <p>Land at Stockings Lane is able to provide small scale residential development to meet local needs. The site is suitable, achievable and developable, and it is therefore respectfully requested that it is considered for release from the Green Belt as part of an extended settlement boundary to Upper Longdon during the process of the Local Plan review.</p>	Comments noted
LPRPO894	Jodie Taylor	Policy ONR1: Green Belt	<p>Serious concern about LDC's intentions for the future of Burntwood. Angry that the council has plans to remove land from the Green Belt which contradicts the statement which states Burntwood will 'maintain its role as a separate and freestanding community bounded by the Green Belt'. What makes this shocking is that a number of buildings close by have been declared as of historic importance. If the buildings are important then the beauty of the area and the green land surrounded them should be logically be viewed as of equal importance. Recently attended a meeting held by BAG where councillors explained the reason land is to be removed from the Green Belt is to ensure a strong local plan. This is supposed to demonstrate the council is planning for long term housing provision by taking land out of the green belt to be 'safeguarded' for long term future development. I don't understand how this would help. Fighting to keep all our space and precious Green Belt land by ensuring it is assessed as being of high importance would demonstrate the council is committed to avoiding having to build on it. However, green belt reviews over the years appear to contain biased remarks. it seems the council has wished to build on Coulter Lane for some years. Clearly removing the important protections that Green Belt status does the exact opposite of what the Council claims to be doing to avoid being forced to build on it. Green Belt cannot be removed unless in 'exceptional circumstances'. The proposal is extremely unpopular locally. The obvious importance of our green land to the local community's health and well being, not least its wildlife, is quite rightly outlined in the council's local plan review. It therefore makes no sense that LDC would do anything to jeopardise the green belt.</p>	Comments noted. The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO895	Tim Coleby (Stantec) on Behalf of Barwood Strategic Land II LLP	Whole document	<p>Representation submitted to show the site at Arkall Farm which is the subject of outline planning permission and allocation within the Local Plan Allocations for up to 1000 dwellings could increase densities which would result in it accommodating up to 1,397 dwellings. Basis of the representation is that in light of the pressing need for additional housing encouraging more effective use of land and higher density development in appropriate locations.</p>	Comments noted.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO896	Gemma Hiden (Avison Young) on behalf of Metacre Ltd	Whole document	<p>Promotes land at Bleak House Farm for residential development of between 396 and 462 dwellings, along with areas of public open space and new habitat, consider the site to be suitable for development, available now and achievable. Have reviewed the preferred options and key elements of the evidence base and have significant concerns about a number of aspects of the emerging plan as well as elements of the evidence which underpins it. These include the council's spatial strategy; distribution of development; housing requirement; approach to site selection; deferral of critical strategic decisions to neighbourhood plans and how it has dealt with certain Green Belt matters.</p> <p>The vision is not appropriate to focus growth on the District's villages in the vein hope that adding housing to small settlements that have little in the way of services and facilities will be transformed into sustainable locations. The vision should recognise that the District has a hierarchy of settlements and to grow sustainably this will mean focussing development on the most sustainable locations.</p> <p>We agree with the settlement hierarchy as expressed in Policy OSS2 although we expect the council to evidence this. Concerns about the proposals to direct the overwhelming majority of growth to the 4 locations listed within the policy. The larger service villages are not the most appropriate or sustainable locations for growth and are at odds with what the council says the spatial strategy will do. The disconnect between what the Council says the strategy will do and what is actually proposed is best evidenced by reference to (a) the way in which development is distributed relative to the settlement hierarchy (which is purported to be reflective of settlement sustainability credentials) and (b) the manner in which Burntwood is treated. To promote a strategy which sees Burntwood receiving only 7% of the Districts growth and much smaller far less sustainable locations accommodating around 33% of growth is wholly inappropriate. Preferred options fails to direct a level of growth to Burntwood consistent with its size, sustainability and relationship with the conurbation, provide proposals and policies to address the housing, service/facility and infrastructure issues with settlement has. It is critical that decisions in respect of the Green Belt and housing site identification are not delegated to the Burntwood neighbourhood plan. Neighbourhood plan process is not suitably equipped to deal with the issues that need to be taken in respect of Burntwood's expansion.</p> <p>Housing requirement does not provide to meet full affordable housing need conflicting with paragraphs 11 and 20 of the NPPF. The solution, not explored in the Council's evidence is to increase the base need to give the Council a chance of delivering the 4840 affordable homes need to 2040.</p> <p>Concerned about the lack of evidence underpinning the proposal to contribute 4,500 dwellings for unmet need. The plan should include flexibility when planning for its housing requirement, the preferred options does not include flexibility and suggest a 20% buffer of land should be planned for (approx. 14,160 dwellings). In addition to providing a sound housing requirement and building in flexibility, the Council will have to demonstrate that its proposed Green Belt boundaries will endure well beyond the plan period.</p> <p>Have major concerns about the site selection process as detailed in the Housing Site Selection Paper 2019.</p> <p>Satisfied in general terms that there are exceptional circumstances justifying the making of changes to the Green belt boundary within the District. The housing needs of the District and HMA are significant and there is insufficient land in sustainable locations within urban areas and beyond the Green Belt to accommodate need. This is particularly the case in Burntwood which has virtually no urban capacity. Concern over the council's approach to reviewing the Green Belt within the Green Belt Review. Note that the council proposes to designate new Green Belt to the north of Lichfield, but this has not been justified by exceptional circumstances. We also note that the Council propose to remove from the Green Belt and designate these as Areas of Development Restraint (ADR). However, doing so without offering any analysis of the total quantum of land that needs to be taken out of the Green belt in order for boundaries to endure well beyond the plan period. As far as Coulter Lane land is concerned we regard this as playing an important role in Green Belt terms and do not subscribe to the Councils view that St Matthews is part of Burntwood. It is separate and the land been these areas to be developed would be wholly at odds with Green Belt policy.</p>	<p>Comments noted. Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.</p>
LPRPO897	K Venham (Barton Willmore) for Curborough South	Policy OSS2:Our Spatial Strategy	<p>Broadly support the Council's Spatial Strategy to locate development in the most sustainable areas and utilise existing infrastructure and services. Lichfield is identified as the most sustainable (Level 1 – Strategic Centre) settlement and the Council rightly confirm this includes Streethay. Consider should be extended to include 'Streethay and Curborough' to encompass the Council's emerging strategy. It is considered that the assumption set out within the HEDNA (0.1% and 0.3% growth per annum) is too low in the context of historic job growth levels over the past 30 years, it is questionable whether the LPR's use of the standard method minimum need truly reflects the housing need required to support the Council's clear economic growth aspirations. Consider the Council should reconsider their evidence and assumptions with a view to planning for additional houses within the District to accommodate the Strategy and unmet needs arising and should take the lack of potential previously developed land into account when considering their strategy.</p>	<p>Support noted. Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review.</p>
LPRPO898	K Venham (Barton Willmore) for Curborough South	Policy NS1: New Settlement	<p>Consider that further information should be provided. Ensure that sufficient development is planned for within this Plan Period and that future plans for a new settlement to meet an as yet unknown need, do not impact upon this and delay the LPR coming forward.</p>	<p>Comments noted.</p>

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO899	K Ventham (Barton Willmore) for Curborough South	Policy OSC1: Securing sustainable development	Ensure that any requirements relating to this policy are justified and evidenced and will not impact upon the viability of developments. Any contributions should be held within the policy and not a SPD. Site at North East Lichfield is well placed to deliver development which takes into account these issues and provide a sustainable form of development. Development of this scale presents opportunities to embed sustainability principles during both construction and operational phases. Such principles will result in holistic, win-win solutions for not only climate change but health & wellbeing, the natural environment and the economy. A critical mass of development could allow key principles to be carried forward as part of a flexible energy strategy. Principles suggested. Technology, quantification and assessment methodologies are constantly evolving as the climate is also changing. Given the scale of development and phased construction programme, the climate strategy will necessarily be a live document that will adapt and become more detailed as the design progresses.	Comments noted.
LPRPO900	K Ventham (Barton Willmore) for Curborough South	Policy OSC2: Renewables and Low Carbon Energy	Amend to clarify that the inclusion of such infrastructure is not a requirement of schemes but something which will be supported.	Comments noted.
LPRPO901	K Ventham (Barton Willmore) for Curborough South	Policy OSC3: Sustainable building standards for non-domestic buildings	Ensure that any policy requirement is considered as part of the Local Plan viability assessment and does not impede the ability to bring forward much needed development.	Comments noted. Council is preparing further viability evidence which will form part of the local plan evidence base and inform the local plan review.
LPRPO902	K Ventham (Barton Willmore) for Curborough South	Policy OSC4: High Quality Design	Requirement to 'clearly and convincingly' demonstrate that development will have a positive impact upon design is beyond the requirements of the NPPF and should be reworded. Elements would be better placed within a specific policy e.g. energy efficiency and renewable energy and the requirement to consider the reclamation, re-use and recycling of construction materials. The viability of achieving any standards that may also exceed Building Regulations requirements should be taken into consideration. Any requirement for exceedance should be evidenced and justified. Site at North East Lichfield is well placed to provide a master planned development which constitutes high quality design.	Comments noted. Council is preparing further viability evidence which will form part of the local plan evidence base and inform the local plan review.
LPRPO903	K Ventham (Barton Willmore) for Curborough South	Chapter 10: Our sustainable communities	OSC5: Flood Risk -Amend to clarify that flood risk assessments will only be required where directed by national policy.	Comments noted. It is not considered necessary to replicate national policy within the policy.
LPRPO904	K Ventham (Barton Willmore) for Curborough South	Chapter 12: Our sustainable transport	OST1: Our Sustainable Transport and OST 2. support.	Support noted.
LPRPO905	K Ventham (Barton Willmore) for Curborough South	Policy OHF1: Housing Provision	While noting our comments relating to the potential to plan for more development within the District to meet economic aspirations and accommodate the wider HMA need, we broadly support the Council's overall strategic approach. The draft Policy should make clear that the number of dwellings proposed within the strategic development allocations are minimums. Wording suggested. Table 3.1 does not sum.	Comments noted. Policy states that housing requirement is a minimum, as such constituent parts of that requirement are considered to be minimums. Table 3.1 to be updated in line with latest evidence at time of publication.
LPRPO906	K Ventham (Barton Willmore) for Curborough South	Chapter 13: Our homes for the future	OHF2: Providing a balanced housing market and optimising housing density -flexibility is welcomed. Should clarify within the draft Policy that any schemes that are broadly in line with the mix are considered policy compliant. Consider that a blanket-density requirement covering the district will not promote high-quality design that reflects the character of the area. Consider that a design brief exercise is suitable for the strategic development sites and density should be considered as part of this process. Support the Council's acknowledgement at Paragraph 13.13 that there is insufficient support to require a portion of allocations to accommodate self-build.	Comments noted. NPPF makes clear higher densities should be achieved. Evidence within the strategic growth study support application of density standards within the HMA.
LPRPO907	K Ventham (Barton Willmore) for Curborough South	OHF4: Affordable Housing	Reserve the right to comment on the rate of affordable in more detail at the appropriate time, viability work should consider all contributions that would be required as part of the LPR.	Comments noted. Council is preparing further viability evidence which will form part of the local plan evidence base and inform the local plan review.
LPRPO908	K Ventham (Barton Willmore) for Curborough South	Policy Chapter 14: Our economic growth, enterprise & tourism	OEET1: Our employment and economic development - To create a sustainable development, the Site at North East Lichfield could provide an element of employment floor space within the mixed use local centres which total 3.9ha. Amend the policy to reflect that large-scale mixed-use development can include employment provision, where appropriate, even though they lie outside of the designated employment areas.	Comments noted. Mixture of uses within strategic development to be considered.
LPRPO909	K Ventham (Barton Willmore) for Curborough South	Chapter 15: Our healthy & safe communities	Support. The Site at North East Lichfield is well placed to provide for local education and health needs. HIA required for any proposals of more than 100 dwellings.	Supported noted.
LPRPO910	K Ventham (Barton Willmore) for Curborough South	Policy OSR2: Open space and recreation	Allocation at North East Lichfield will provide significant open space which can be utilised by both existing and future residents. Quantum and quality of the green infrastructure proposed on the scheme at The Lakes at Watery Lane demonstrates IM Land's commitment to high quality open space provision.	Comments noted. Development will be expected to meet open space requirements to be set out within local plan.
LPRPO911	K Ventham (Barton Willmore) for Curborough South	Policy ONR1: Green Belt	The creation of a new area of Green Belt to the north of Lichfield, covering the area between the proposed route of HS2 and the LNWR line outside of the consented Watery Lane area and draft North East Lichfield allocation. This would result in a large area of Green Belt to the north of Lichfield, forming a continuation to that west of the LNWR, and a thin strip of between circa 80 and 400m, but generally of 100m in width. This latter strip will be situated between the proposed draft allocation at North East Lichfield and the proposed route of HS2.This latter area is not appropriate for Green Belt will not serve any of the purposes set out in paragraph 134. Further, it has not been demonstrated how other local policies would not be appropriate for this area not accord with NPPF. Should HS2 not be constructed, there will be no defensible boundary to the proposed Green Belt in this area, instead comprising an arbitrary line on the ground not marked by physical features. This would be in contravention of the NPPF.	Comments noted. Council considers that circumstances exist to justify the designation of new Green Belt to the north of Lichfield in accordance with paragraph 135 of the NPPF. New Green belt would serve the purposes of the Green Belt set out within paragraph 134 of the framework.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO912	K Ventham (Barton Willmore) for Curborough South	Policy OBHE1: Historic environment	No reference within the NPPF to 'enhancing' heritage assets so Policy should be amended. Policies relating to conservation and heritage matters duplicate the requirements of the NPPF. For the sake of brevity these could be reduced.	Comments noted. Considered policy is appropriate to protect districts heritage assets and consistent with NPPF.
LPRPO913	K Ventham (Barton Willmore) for Curborough South	Policy SHA1: Strategic housing allocation North of Lichfield	Support allocation and provision of a master plan, could be further strengthened to require a design brief is created in relation to the Site to ensure the highest standard of design and provide greater certainty as to the location and delivery of infrastructure. Amend boundary to align with the submitted information. Northern area of the allocation also inserts slightly into land within the HS2 Bill limits and this should be amended. Finally, the draft Policies Map uses an outdated version of the HS2 alignment and the most up to date version should be used. Additional information submitted to show how proposed scheme complies with the requirements of the draft policy.	Note updated information in relation to site boundary and route of HS2. Take account of latest information as local plan review progresses.
LPRPO914	Birmingham City Council	Chapter 6: Issues	Meeting the strategic housing and employment requirements for our district, including assisting in meeting needs from within the housing market area" as one of the key issues facing Lichfield District over the plan period. This approach is strongly supported by Birmingham City Council in fulfilling the requirements of the NPPF and the Duty to Co-operate.	Support noted.
LPRPO915	Birmingham City Council	Chapter 9: Our spatial strategy	Welcomes and supports this approach in providing a significant contribution to assist in meeting unmet need from elsewhere within the housing market area. Although the potential uplift in delivery is ambitious and significant, recent delivery rates of housing within Lichfield District suggest that this level of growth is achievable and deliverable.	Support noted.
LPRPO916	Birmingham City Council	Policy NS1: New Settlement	Welcomes the fact that such a settlement would be plan-led and included within a subsequent review of the local plan. Supports this proposal and long term approach as long as it is clear that any new settlement of this scale will assist in sustainably meeting any future unmet need identified within the conurbation.	Support noted. New settlement policy seeks to outline approach to meeting district's development requirements beyond the plan period.
LPRPO917	Birmingham City Council	Chapter 13: Our homes for the future	OHF2: widely welcomed and supported. Densities generally reflect the advice of the NPPF and the Strategic Growth Study (2018).	Support noted.
LPRPO918	Birmingham City Council	Chapter 14: Our economic growth, enterprise & tourism	Supports.	Support noted.
LPRPO919	Birmingham City Council	Chapter 18: Lichfield and Streethay	No cross-boundary issues.	Comments noted.
LPRPO920	Birmingham City Council	Chapter 19: Burntwood	No cross-boundary issues.	Comments noted.
LPRPO921	Birmingham City Council	Chapter 20: Larger service villages	No cross-boundary issues.	Comments noted.
LPRPO922	Birmingham City Council	Chapter 21: Smaller service villages	No cross-boundary issues.	Comments noted.
LPRPO923	Birmingham City Council	Whole document	Welcomes the contents of the Preferred Options including the vision, strategic priorities and policies under consideration and the opportunity for continued engagement with Lichfield District Council through the Duty to Co-operate process. Key strategic cross boundary issue for Birmingham is the unmet housing need for the Greater Birmingham and Black Country HMA. latest published evidence for the HMA was the 2018 Position Statement, issued by the local planning authorities making up the HMA, which identified that there was still a housing shortfall across the area despite the fact that the size of the shortfall had reduced considerably. The Position Statement is currently under review and, whilst this is expected to show further progress in reducing the shortfall, evidence is being gathered by the Black Country Authorities which suggests the shortfall across the HMA is likely to increase again as a result of their Local Plan Review. Birmingham City Council will also be assessing its own housing requirements beyond 2031 as part of evidence gathering for a potential review of the Birmingham Development Plan in the near future.	Comments noted. Local plan review seeks to contribute toward the current shortfall in housing within the HMA.
LPRPO924	Terry Moore	Policy SHA2: Strategic housing allocation land west of Fazeley	Objects to the development at Mile Oak on the green belt because of the pressure it would put on traffic, shops, education and medical facilities which are already over burdened.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO925	Historic England	Whole Document	Para1.2 Welcome reference to heritage, request historic assets changed to heritage assets. Appendix B expect to see a heritage assessment as part of any Masterplan where heritage assets could be impacted, setting out an understanding of the significance of heritage assets and the harm to the significance of heritage assets and their setting. This could also include views and vista assessment etc. This would also tie in with policy requirements for OBHE4.	Comments noted. Heritage impact assessment required on appropriate planning applications. Not considered necessary to include this requirement in masterplan guidelines. Policy OBHE4 also already includes this requirement and sets it out in policy.
LPRPO926	Historic England	Chapter 3: national context	Support the reference in paragraph 3.5.	Support noted.
LPRPO927	Historic England	Chapter 5: Profile of the District	Very supportive of a specific section on the historic environment. Recommend amending 'ancient monuments' to 'scheduled monuments'. Recommend amending 'historic sites and assets' to 'heritage assets'. Welcome the detail in paragraph 5.31	Support noted. Change terminology as suggested.
LPRPO928	Historic England	Chapter 6: Issues	Key characteristics table could be further developed to discuss what the significance of the historic environment for Lichfield District is, what are the core elements to protect and enhance and how does the historic environment feature in the plans for future development? Support key issues table on page 26, clause 12 the inclusion of a bullet point for the historic environment and would recommend the term 'heritage' inserted before 'assets'.	Comments noted. Amend issue relating to heritage assets as suggested.
LPRPO929	Historic England	Chapter 7: Our vision	Support reference to the historic environment within the vision and welcome this as part of the Council's aspirations. Recommend that the term is amended to 'where heritage assets are protected and enhanced'.	Support noted.

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LPRPO930	Historic England	Chapter 8: Our strategic objectives & priorities	Support SO 7 P 14. Welcome addition that includes the wider historic environment and encompasses heritage assets that would be found in a rural setting, as well as historic landscapes. We would recommend the term 'built environment' was replaced with 'historic environment, heritage assets and their setting' to encompass a wide definition of heritage.	No change proposed. The objective is wider than just the historic environment.
LPRPO931	Historic England	Policy NS1: New Settlement	Recommend that these are included as separate issues and that there is a positive strategy for the historic environment; this would include protecting the significance of heritage assets and their setting, avoiding and minimising harm, using the local character as inspiration for design, materials, layout, height, scale etc. of a new development, seeking opportunities to enhance heritage assets and their setting.	Comments noted. New settlement policy aims to look at development beyond the current plan period.
LPRPO932	Historic England	Policy OSC1: Securing sustainable development	Support a bullet point that seeks to support the character and distinctiveness of Lichfield district. Would encourage links to be included to documents that detail what the character and distinctiveness is to guide developers.	Support noted.
LPRPO933	Historic England	Policy OSC2: Renewables and Low Carbon Energy	Support the clause that references the historic environment.	Support noted.
LPRPO934	Historic England	Policy OSC4: High Quality Design	Support. Consider the first sentence 'protecting the significance of the historic environment, heritage assets and their setting and the setting sentence looking at issues such as skylines etc. could be clearer. Consider the information contained within the third sentence could be contained within a strategic historic environment policy.	Comments noted. Will review policy wording in light of comments regarding clarity.
LPRPO935	David Malpas	Policy SHA2: Strategic housing allocation land west of Fazeley	Objects to the proposal to allocate the land at Mile Oak adjacent to the A453 for development of 800 homes on the basis of development on the Green Belt, inappropriate develop in relation to the existing 'ribbon' nature of development of Fazeley & Mile Oak, inadequate infrastructure, traffic implications for the A453 and bio diversity issues. Suggests other sites along Bonehill Road, Grange wood Garden Centre, the area between the A453 and the A5, the land between A453 and plantation lane around the Mercedes garage and also the paddock area of land fronting the B5404 near Bonehill. Accepts that these sites are in the Green Belt and wouldn't solve traffic issues.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO936	Historic England	Chapter 13: Our homes for the future	Welcome a clause within policy OHF3 that seeks to assess any impacts for the historic environment.	Support noted.
LPRPO937	Historic England	Chapter 14: Our economic growth, enterprise & tourism and OEET2	Support a clause in Policy OEET2 that seeks to encourage heritage tourism within centres, and supports heritage assets and features within the centres and public realm. Strengthen reference to shopfronts and adverts and in relevant cases to conservation areas. Suggest reword 14.15 to set out expectations and how enforced.	Supported noted.
LPRPO938	Historic England	Policy OEET4: Tourism	Supportive of a clause in Strategic Policy OEET4: Tourism that relates to heritage tourism and how the Council will be supportive of this.	Supported noted.
LPRPO939	Historic England	Policy ONR5: Natural and historic landscapes	Welcome. Recommend addition to para 3 Where there is a potential impact/harm to the significance and setting of Lichfield Cathedral this should be avoided and appropriate mitigation measures put in place. Support cumulative impacts to be considered, could possibly add in explanation what would be expected and any links to existing evidence base documents.	Comments noted.
LPRPO940	Historic England	Chapter 17: Our built and historic environment	Welcome the inclusion of a strategic policy for the historic environment, heritage assets and their setting. Suggest rewording of OBHE1. We do not support the inclusion of Policy OBHE2 - suggest this is included in OBHE1. OBHE3 - needs further justification. Support OBHE4 and suggest including it in Strategic policy OBHE1. Suggest more be added regarding archaeology. Alter reference from historic assets to heritage assets. Para 17.3 How is authority addressing buildings at risk? 17.5 and 17.6 should be amended to reflect NPPF. Support 17.11 and 17.12 and wonder if the Council is going to include a tall buildings policy. Support 17.13.	Comments noted, await receipt of suggested revisions from Historic England. Updated historic landscape evidence published alongside preferred options consultation.
LPRPO941	Historic England	Chapter 18: Lichfield and Streethay	Support. Suggest replace 'sustained' with 'protected' is views analysis information available?	The protection of the historic environment is secured through other policies and the NPPF. The evidence on views is within the Landscape evidence published as part of the Local Plan.
LPRPO942	Historic England	Policy SHA1: Strategic housing allocation North of Lichfield	Concerned. Request heritage assessment and more detail within the policy to assess the impacts on the significance of the heritage assets, how harm is being avoided, mitigated and enhancement measures.	Concern noted.
LPRPO943	Historic England	Policy LC1: Lichfield Economy	Support	Support noted.
LPRPO944	Historic England	Policy LC2: Lichfield environment	Support and seek amendments. Support reference to views and vistas and consider the information should be made available in the reasoned justification.	Comments noted. Amendments would duplicate strategic policy included within preferred options document.
LPRPO945	Historic England	Chapter 20: Larger service villages	Support the vision for Alrewas. Recommend amending 'Sustained' to 'Protected' in vision for Armitage with Handsacre. Support AH1, recommend 'Ancient Monuments' is amended to 'Scheduled Monuments'. Unclear on the vision for Fazeley and how the strategic allocation ties in to the vision and the protection of its heritage. Welcome the proposed vision for Fradley and the need for the development site to connect with the Canal Conservation Area and provide enhancements for this heritage asset. We recommend that the term 'heritage asset' is included within the policy. Supportive of the vision for Little Aston on page 114. Supportive of the approach for Shenstone from page 116.	Comments noted. Consider whether proposed amendments to vision are required. Make changes as suggested in respect of terminology of heritage assets.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO946	Historic England	Policy SHA2: Strategic housing allocation land west of Fazeley	Add a new clause for the historic environment. What does the assessment work highlight for this site and its relationship to nearby listed buildings/ conservation area? How will the development of the site respond to the historic character of the area? What enhancement opportunities are there for the wider 'at risk' historic environment? Sensitive and appropriate development in conservation areas and listed buildings may be appropriate depending on the context of the development. We would welcome the opportunity for the conservation area to be taken out of its 'at risk' allocation and appropriate repair and retention of listed buildings. What is the Council's strategy for achieving this?	Comments noted. Heritage matters considered in range of evidence base documents including sustainability appraisal.
LPRPO947	Historic England	Policy SHA3: Strategic housing allocation land north and south of Hay End Lane, Fradley	Recommend a site specific heritage criteria that responds to the issues identified through the heritage assessment. Local Policy FR1 seeks improvements for the Canal Conservation Area, how will this be achieved through this development.	Comments noted.
LPRPO948	Historic England	Policy SHA4: Strategic housing allocation land of Huddlesford Lane	Concern regarding proximity to conservation area, welcome sight of heritage assessment.	Comments noted.
LPRPO949	Historic England	Glossary & abbreviations	Welcome the inclusion of the NPPF definition of 'heritage assets' to be included within the glossary	Agreed.
LPRPO950	Susan Spencer	Policy SHA2: Strategic housing allocation land west of Fazeley	Impact on local environment – loss of green belt plus impact of HS2 will be detrimental to the local environment. We should not be taking more Green Belt land and losing more wildlife when there are plenty of Brown Field and other sites that could be used with far less negative impact. The scale of proposed allocation is disproportionate to the existing residential area. Land is also on the boundary with Tamworth BC, the requirement for supporting amenities, infrastructure and the wider consequences to local residents will fall within the remit of Tamworth Council. The scale of the development will also have an impact on the already poor road infrastructure and further congestion. Larger scale developments are already occurring the in immediate locality at Dunstall Park – has this been taken into consideration given the cumulative impact of the development on the existing highway network. Concerns regarding the level of infrastructure required to sustain this scale of development being delivered such as schooling, healthcare provision and policing.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO951	Rachel Hall (Planning Prospects) on behalf of Wallace Land Investments Ltd	Whole document	Concerns about the soundness of the plan principally in so far as; <ul style="list-style-type: none"> The Spatial Strategy is flawed, with too much emphasis on Lichfield and large-scale expansion of Lichfield and other strategic housing allocations to the detriment of a more balanced and deliverable strategy which would see a larger range of smaller and medium sized development opportunities around the District Burntwood as a Tier 2 settlement is more sustainable than the Tier 3 settlements and growth should be prioritised here with a greater proportion of growth being directed to Burntwood The Plan fails to provide a robust trajectory of delivery over the plan period A positive buffer of additional growth should be planned for to ensure the minimum housing need is met There are exceptional circumstances to release land from the Green Belt for housing in sustainable locations such as Burntwood in the context of a balanced strategy to meet housing needs The Wallace site in Burntwood is particularly suitable to be removed from the Green Belt and provide for additional housing; it is more suitable and appropriate than the Council's currently identified Area of Development Restraint. The site is deliverable early in the Plan period (Years 1 to 5). 	Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO952	Rachel Hall (Planning Prospects) on behalf of Wallace Land Investments Ltd	Section 7: Our vision	The general sentiment of the proposed 'Vision for our district' is supported, including the statement that '...Our residents will be able to access quality homes which meet their needs...'. Delivery on this aspect of the vision is an essential part of a successful plan for the district and wider housing market area. Concerns are expressed in these representations on the failure of the current strategy to deliver this vision, notably with an absence of allocations at Burntwood in direct conflict with the settlement hierarchy. Reference in the Vision to a requirement for appropriately evidenced release of Green Belt land to deliver the aspirations of the Plan is welcomed and is an essential part of planning positively for growth in the District	Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO953	Rachel Hall (Planning Prospects) on behalf of Wallace Land Investments Ltd	Section 8: Our strategic objectives & priorities	In order to successfully meet the District's needs within the plan period, it needs to allocate a range of sites in a range of locations. To truly support the delivery of sustainable communities for the duration of the plan period, the objective should be expanded to refer to delivery of homes in large settlements not just in the short term, but also in the medium and long term, including appropriate Green Belt release. Focussing too much development on a small number of large sites and reliance on a future new settlement creates a high degree of risk that the housing requirement of the Local Plan Review will not be met, and delivery of the sustainable communities objective will fall short. This threatens the delivery of the Local Plan Review as a whole.	Comments noted. Spatial Strategy includes a range of allocations inclusive of those already committed which are set out in Appendix A of the preferred options document.
LPRPO954	Rachel Hall (Planning Prospects) on behalf of Wallace Land Investments Ltd	Policy OSS1: Presumption in favour of sustainable development	Wallace supports the policy's commitment to taking a positive approach to development, reflecting the presumption in favour of sustainable development as set out in the National Planning Policy Framework. Policy text should be revised to acknowledge that development must accord with the development plan 'unless material considerations indicate otherwise' to be clear that whilst decision-taking should be plan-led, it must also be a balancing exercise taking into account other material considerations.	Comments noted, wording of policy is considered appropriate. NPPF provides detail of how the presumption in favour of sustainable development is applied.

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LPRPO955	Rachel Hall (Planning Prospects) on behalf of Wallace Land Investments Ltd	Policy OSS2:Our Spatial Strategy	<p>The Policy confirms a commitment to delivering a minimum of 7,282 dwellings during the plan period to 2040, in addition to a contribution of 4,500 dwellings towards meeting the Greater Birmingham and Black Country housing market area shortfall. For consistency, policy OHF1 and OSS2 should reference the same minimum housing requirement. Allowing for a reasonable contingency such as this is essential to ensuring that the Plan supports the Government's objective of significantly boosting the supply of homes and planning positively for the delivery of homes within the District. It is also consistent with the approach taken in other authorities across the region.</p> <p>The settlement hierarchy is supported, with Burntwood identified as Level 2, below Lichfield City. As a 'level 2 – other main centre', Burntwood is capable of delivering additional sustainable development in the form of a mix and range of properties at values which will be of demand in the market. Such development can bring about and facilitate positive infrastructure improvements to the town to the benefit of new and existing residents alike. Housing growth at Burntwood would also support and underpin the viability of the policy aspiration for Burntwood town centre to be a focus for new and improved retail development. It is bizarre that Burntwood (level 2) receives such little growth, with no specific sites allocated for growth during the plan period.</p> <p>The policy acknowledges that changes to the Green Belt boundary will be made where necessary. Release of Green Belt land is essential to provide for a deliverable range and scale of new development appropriate to Burntwood, including a contingency of at least 10 per cent above the minimum requirement. If any matters of detail (non-strategic policies) are to be addressed through a neighbourhood plan, these need to be based on clear policy within the Local Plan on the scale of growth that is required to be accommodated within Green Belt release sites at Burntwood and the specific areas where Green Belt release is required.</p>	A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO956	Rachel Hall (Planning Prospects) on behalf of Wallace Land Investments Ltd	Policy NS1: New settlement	Wallace do not raise an in principle objection to provision of a new settlement to meet the longer term housing needs of the District and wider area, the nature of the development of such large scale development comes with a range of complex issues which need to be addressed before development can proceed. As a result, there is a high level of uncertainty over ability to deliver and timescales for delivery of new homes. Caution therefore needs to be taken in placing any reliance on delivery from the new settlement during this plan period.	Comments noted.
LPRPO957	Rachel Hall (Planning Prospects) on behalf of Wallace Land Investments Ltd	Policy OSC1: Securing sustainable development	The policy sets out a number of key issues to help achieve sustainable development which are generally supported. One of these key issues is to encourage the re-use of previously developed land which is supported in principle, however given the limited supply of previously developed land within the District, and the high proportion of Green Belt land. In constrained areas, such as Burntwood, development of sustainable Green Belt sites can enhance the overall sustainability of a settlement by increasing its population and demand for goods and services which may be struggling in part due to viability. The Wallace proposals for land east of Burntwood is a sustainable development in this context; it is located immediately adjacent to the settlement with non-vehicular connectivity to facilities and services.	Comments noted. NPPF makes clear the effective use of land and re-use of land are key part of the approach to planning.
LPRPO958	Rachel Hall (Planning Prospects) on behalf of Wallace Land Investments Ltd	Policy OHF1: Housing Provision	<p>As set out in response to policy OSS2, the total requirement of 11,800 dwellings exceeds the minimum requirement by just 18 dwellings. For soundness and to be effective in delivering the Plan requirement for housing, the minimum target specified in the Plan should exceed the minimum housing requirement by least 10 per cent.</p> <p>In order to plan positively for housing growth within the District, to ensure sufficient sites are allocated to meet the need and can be delivered at a sufficient rate, changes to Green Belt boundaries and allocation of relevant sites should be confirmed upfront through the Plan. If any matters of detail (non-strategic policies) are to be addressed through a neighbourhood plan, these need to be based on clear policy within the Local Plan on the scale of growth that is required to be accommodated within Green Belt release and the areas where Green Belt release is required.</p> <p>To ensure a flexible and deliverable housing land supply, a sound local plan and housing trajectory, Wallace would welcome the Council to identify a combination of small, medium, and large sized sites in different market locations to ensure choice, competition and most importantly delivery of new market and affordable homes. The lead in time for medium-scale development is generally more expeditious and if there is more than one outlet on a site, delivery of between 50-80 dwellings per developer would have a direct impact upon addressing housing need for the District and the wider HMA. In this context, the delivery of Wallace's site for up to 300 new homes is a logical site in the context of the need for a combination of small / medium sites.</p>	Comments noted. Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO959	Rachel Hall (Planning Prospects) on behalf of Wallace Land Investments Ltd	Policy OHF2: Providing a balanced housing market and optimising housing density	The proposed policy to deliver a balanced housing market with an integrated mix of dwelling types, sizes and tenures is supported, along with the intention for the mix of dwellings to be informed by local housing need evidence. The reference to the final mix of dwellings types and sizes being subject to negotiation with the applicant and the potential for deviations from policy to be justified by evidence, including viability, is welcomed.	Support noted.

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LPRPO960	Rachel Hall (Planning Prospects) on behalf of Wallace Land Investments Ltd	Policy OHF4: Affordable Housing	The policy sets out a high need for affordable homes, with circa 80% of overall need being for affordable housing. Further viability testing is to be undertaken by the Council to identify the appropriate rate. The policy confirms that a flexible approach on thresholds, proportions, tenure, size and type will be taken on a scheme by scheme basis to reflect the housing needs in the locality and ensure scheme viability, subject to an open book approach by developers. The flexibility to thresholds and ability for review on a site by site basis, subject to appropriate evidence, is supported to ensure that the policy does not set unreasonable expectations that prevent sites coming forward for delivery and meeting housing need which will help affordability through increasing supply within the District.	Comments noted. Evidence demonstrates the high need for affordable housing within the District. The council continues to gather evidence in support of the local plan. Further viability evidence will be gathered to inform the further stages of the local plan.
LPRPO961	Rachel Hall (Planning Prospects) on behalf of Wallace Land Investments Ltd	Policy ONR1: Green Belt	This policy reiterates national policy on Green Belt, confirming proposals for enhancement of the Green Belt will be supported and inappropriate development will not be approved except in very special circumstances. The policy confirms that there is a strategic need to make changes to the Green Belt boundary to accommodate growth, and that amendments will be adjacent to Fazeley and Whittington. New Green Belt is also proposed to the north of Lichfield, alongside the strategic development allocation and will prevent coalescence of Lichfield and Fradley. The policy confirms that in areas of development restraint, permission will not be granted for any development that would prejudice decisions on their long term future. The sites are not allocated for development and permission would only be granted following an update to the local plan or where a neighbourhood plan proposes the development. There is therefore no certainty that these areas of development restraint will contribute to housing delivery during the current plan period or whether they are in addition to other Green Belt releases which are expected through Neighbourhood Plan processes.	Comments noted. The purpose of safeguarded land is set out within the NPPF. Considered to be in line with NPPF to identify such designations which are not for development within the plan period.
LPRPO962	Rachel Hall (Planning Prospects) on behalf of Wallace Land Investments Ltd	Chapter 19: Burntwood	Chapter 19 of the Preferred Options document deals specifically with Burntwood, covering the vision and local policies on economy (B1), environment (B2) and services and facilities B3)). The vision is to maintain Burntwood as a distinct community and functioning town with investment in new infrastructure to create a more sustainable, healthier and self-contained settlement. Provision is to be made for 438 dwellings through existing commitments and 400 allocated through the neighbourhood plan process. The commitment to supporting Burntwood's role as the second largest settlement in the district is welcomed, along with the aspiration for the town to meet the needs of its businesses and residents. However, the proposed allocation of 400 dwellings through the neighbourhood plan process is disproportionately too low for the second largest settlement. Burntwood is capable of delivering additional development, it can provide a mix and range of properties at values which will be of demand in the market and such development can bring about and facilitate positive infrastructure improvements to the Town which could be valued locally to new and existing residents alike.	Comments noted. Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO963	Rachel Hall (Planning Prospects) on behalf of Wallace Land Investments Ltd	Policy INF1: Delivering our Infrastructure	This policy confirms the Council will work with infrastructure providers, agencies, organisations and funding providers to enable delivery of infrastructure. An Infrastructure Delivery Plan will be published to support and direct infrastructure requirements. Realistic infrastructure costs should be established to identify whether the allocations are viable and developable during the plan period	Comments noted. The council continues to gather evidence in support of the local plan. Further viability evidence will be gathered to inform the further stages of the local plan.
LPRPO964	Rachel Hall (Planning Prospects) on behalf of Wallace Land Investments Ltd	Chapter 12: Our Sustainable Communities	This policy sets out the expectation for planning applications to be accompanied by flood risk assessments in line with national policy requirements. To bring the policy in line with national policy, it should be revised to require sustainable drainage systems for major developments unless demonstrated to be 'inappropriate' and ensuring operation and maintenance requirements are economically proportionate.	Comments noted.
LPRPO965	Stephen Tucker	Policy SHA2: Strategic Housing Allocation land west of Fazeley	Firmly opposed to proposed development and any variation of it on the site at Mile Oak. Supposed to be doing utmost to protect Green Belt, surely there are plenty of brownfield and other sites that could be used. Proposal to build 800 homes is completely at odds with the current size of Fazeley. Its location on edge of jurisdiction means it will count towards LDC's new build quota but required amenities, infrastructure and consequences will fall within Tamworth Councils remit. Fazeley is a linear conurbation it would take 15-20 minutes to walk to the centre of Fazeley. Will have significant impact on traffic, the A453 is already heavily congested with traffic from Birmingham and Sutton, the A5, M42, Ventura park and residents. Noise pollution is also constant. HS2 construction is less than half a mile up the road from the proposed site. There is also 750 homes being built at Dunstall Park half a mile away. Residents of Fazeley have no local doctors or dentists and have to travel to Tamworth Town Centre for these facilities. Only hospital has no A&E. Development of this size will ruin the rural feel of Fazeley. Due to poor communication from LDC to Fazeley residents community has taken it upon themselves to ensure all residents have been made aware of the plans. Appreciates LDC promoted event on 9th December at Fazeley Town Hall. The courtesy of a printed leaflet to every household would have cost no more than £60 to produce.	Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.

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LPRPO966	Mark Rose (Define Planning & Design) on behalf of Bloor Homes (Max Whitehead)	Policy OSS2: Our Spatial Strategy	<p>Affordability issues associated with housing have manifested particularly acutely in Lichfield.</p> <p>Housing requirement of 11,800 dwellings with the figure being derived from the Local Housing Need (LHN) Of 7,282 dwellings plus a contribution of 4,500 dwellings towards meeting the GBCHMA shortfall. Welcomes LDC's intention to positively plan for the needs of the District and neighbouring Local Authorities, there is evidence to suggest that the LDC should consider an uplift to the LHN to address issues of affordability and an ageing population. There is also justification for raising the level of housing proposed to help to address the GBHMA shortfall.</p> <p>Agrees that the preferred spatial strategy, based on the settlement hierarchy set out within the policy, would be an appropriate approach to meeting the identified housing needs in the plan period, in a manner that appropriately reflects the geography of the Borough and the distribution of the unmet needs from the wider HMA. It is also critical that the identification and allocation of development sites properly and fully reflects the spatial strategy. Currently that is not the case as grossly insufficient provision is proposed at key sustainable settlements such as Shenstone and Burntwood.</p> <p>Supports the identification on land South of Lichfield as an area of development constraint. Focus of growth in this location accords with settlement hierarchy and spatial strategy. However, it is apparent that the site should be allocated for development now in order to ensure the identified housing requirement is met within the plan period.</p>	<p>Comments noted. Spatial strategy and proposed allocations along with committed supply considered sufficient to meet housing requirement established within preferred options document. The purpose of safeguarded land is set out within the NPPF. Considered to be in line with NPPF to identify such designations which are not for development within the plan period.</p>
LPRPO967	Mark Rose (Define Planning & Design) on behalf of Bloor Homes (Max Whitehead)	Policy NS1: New settlement	<p>Welcomes LDCs intention to "look ahead over a minimum of a 15 year period from adoption to anticipate and respond to long-term requirements and opportunities", but also the recognition in doing so that a new settlement would not start deliver any housing within this plan period and, therefore, not address the District's LHN.</p>	<p>Comments noted. Policy and explanatory text make clear that new settlement is unlikely to deliver growth in the current plan period.</p>
LPRPO968	Mark Rose (Define Planning & Design) on behalf of Bloor Homes (Max Whitehead)	Policy OSC4: High Quality Design	<p>Supports the intent of Policy OSC4 however PPG states that policies relating to design should go beyond merely repeating guidance set out in the NPPF. Policy is imprecise and lacks clarity. Consequently this policy would be open to wide interpretation and difficult to effectively apply in the development management process.</p> <p>Recognises and welcome the aspiration of Strategic Policy OSC4 in regards to energy efficiency and carbon reduction. However, policy must be sufficiently flexible to allow for location and context- specific considerations to be taken into account. Blanket application of such aspirational policy requirements may compromise otherwise sustainable development.</p> <p>Furthermore, the policy should allow greater flexibility by including reference to the potential inclusion of alternative measures to mitigate climate change. For example, Bloor Homes 'fabric first' approach when compared to renewable technologies there is no maintenance required, and it avoids the concerns as to whether the technologies are actually being used.</p>	<p>Comments noted. There is no statutory planning requirement to include a 'buffer' on top of the housing requirement. The preferred options document does state that a buffer to ensure flexibility in supply will be applied. Further evidence in terms of housing supply will be prepared and inform the local plan review.</p>
LPRPO969	Mark Rose (Define Planning & Design) on behalf of Bloor Homes (Max Whitehead)	Policy INF1: Delivering Our Infrastructure	<p>Intent of INF1 is supported as it is critical that the future growth in the plan area is appropriately supported by the necessary community, highway and utilities infrastructure.</p> <p>Welcomes the recognition of the role of a wide range of actors in delivering infrastructure within the policy. However, this policy should be more explicit to encourage the proactive involvement of actors within infrastructure delivery. For example, the policy should reflect that it is the responsibility of the utilities company to provide necessary water supply and wastewater infrastructure to support development. Their investment programmes are not necessarily integrated with Local Plans, and often will not address the development requirements for an area until specific proposals become committed, normally through the grant of planning permission.</p>	<p>Support noted.</p>
LPRPO970	Mark Rose (Define Planning & Design) on behalf of Bloor Homes (Max Whitehead)	Policy OHF1: Housing Provision	<p>Flexibility - A flexible contingency of 20% (as per the Local Plan Advisory Group's recommendation) should be applied to the overall housing land supply to ensure that the LHN is recognised and treated as a minimum rather than a maximum figure. In this light, the LDLPR should plan for the delivery of 14,160 dwellings by allocating additional development sites, which would include the Areas of Development Restraint (ADR) that are proposed to be safeguarded for future development, and other suitable sites such as to the east of Shenstone, which would fully realise the proposed spatial strategy.</p> <p>Realistic Delivery Assumptions - note the considerable dependence on the delivery of housing to the north-east of Lichfield in the spatial strategy. Strategic Policy OHF1 sets out to delivery approximately 3,300 dwellings within this single location; which represents 28% of the overall housing requirement of the District in the period to 2040 which will be complicated to deliver. LPR must take a realistic view of the timescale of the sites delivery. LDC must include a trajectory illustrating expected rate of housing delivery over the plan. If anticipated delivery will not meet the housing requirement then the document will need to allocate additional development sites.</p> <p>Existing commitments - it should not be presumed that previously allocated sites should be allocated again. No evidence of the audit undertaken to confirm that the sites allocated that have not yet come forward are still 'deliverable' and 'developable'. LDC must ensure a continual supply of housing from a substantial and wide portfolio and also a 5 year supply of deliverable housing land supply at the point of LDCs adoption and a rolling supply thereafter.</p> <p>Contend that proposed land south of Lichfield ADR should be allocated.</p>	<p>Comments noted. There is no statutory planning requirement to include a 'buffer' on top of the housing requirement. The preferred options document does state that a buffer to ensure flexibility in supply will be applied. Further evidence in terms of housing supply will be prepared and inform the local plan review.</p>

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LPRPO971	Mark Rose (Define Planning & Design) on behalf of Bloor Homes (Max Whitehead)	Policy OHF2: Providing a Balanced Housing Market and Optimising Housing Density	<p>Support Strategic Policy OHF2 in principle but policy should allow a degree of flexibility to take into account the site and context characteristics as well as market demand in locality to ensure the housing mix is justified.</p> <p>Inappropriate therefore to include a preferred mix table within policy as it does not reflect the issues that indicate that a site specific approach would be more effective when considering a balanced housing provision. This is reflected in Policy OHF2 which states that types, tenures and sizes of houses delivered should 'reflect and respond to latest housing needs and demands of the district'; a sentiment that is supported.</p> <p>Essential that the difference between need and demand is recognised in the Local Plan, for example the need for smaller households might be for smaller properties, the actual demand is commonly still for larger properties.</p> <p>Contends that the preferred housing mix table should be removed from Policy OHF2.</p>	Comments noted. Policy seeks to provide a balanced housing market within the district and provide a mix of dwellings to meet evidenced need.
LPRPO972	Mark Rose (Define Planning & Design) on behalf of Bloor Homes (Max Whitehead)	Policy OHF4: Affordable housing	<p>Fully supports the provision of affordable housing an integral part of housing development to meet the areas affordable housing needs. Policy seems to indicate that the maximum level of provision will be sought on a site by site basis, presumably based on a viability appraisal undertaken at the application stage. However, this approach is contrary to the NPPF.</p> <p>Policy OHF4 must seek to set a fully justified and clear affordable housing requirement (both the quantum and mix). That will provide the land owners and developers with the certainty they required to ensure the delivery of the sustainable development of the proposed allocation sites needed to address the identified market and affordable LHN.</p> <p>If a higher level of affordable housing is required than can be feasibly delivered in the proposed developments, then a higher level of overall housing provision should be sought to address that aspiration.</p>	Comments noted. The council continues to gather evidence in support of the local plan. Further viability evidence will be gathered to inform the further stages of the local plan.
LPRPO973	Mark Rose (Define Planning & Design) on behalf of Bloor Homes (Max Whitehead)	Policy SHA1: Strategic housing north of Lichfield	<p>Housing delivery strategy largely relies on the timely delivery of 3,300 homes at the strategic housing allocation north of Lichfield. Reliance on such a significant strategic allocation is particularly risky in relation to meeting the LHN within the plan period and maintaining a five year supply of housing as, by their very nature, large sites are complicated to deliver and can often be subject to delays and reduced delivery rates. LDC must include a trajectory illustrating the expected rate of housing delivery over the plan period in this key development based on a reasonable assessment of lead in times and delivery rates.</p> <p>For sites of 2,000+ dwellings research shows, the average Total Development Timescale (from the submission of the first planning permission to the delivery of the first dwelling on site) is 8.5 years. Using that assumption and that a planning application would immediately follow the adoption of the document, delivery on site would likely begin in 2030/31 which would afford 9/10 years of delivery within the remaining plan period, meaning the site would be extremely unlikely to build out to its full capacity by the end of the plan period leading to unmet housing need in the District which should be addressed by allocation additional sites.</p>	Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO974	Mark Rose (Define Planning & Design) on behalf of Bloor Homes (Max Whitehead)	Policy ONR1: Green Belt	<p>Supports proposed amendments to Green Belt in order to release sites for residential development to address local housing need. In particular supports the proposed amendments to remove Land off Fossey Lane, Lichfield from the Green Belt.</p> <p>The need for a considerable amount of development land to come forward to meet the housing needs of the District and wider HMA is evident; particularly given the lack of flexibility afforded within the District's housing need, the reliance of LDC's housing supply on a large and complex strategic allocation North of Lichfield, and the requirement of the District to establish a portfolio of deliverable sites to establish and maintain a five year supply of deliverable housing. Therefore, contends that the Land off Fossey Lane, Lichfield should be released from the Green Belt and allocated for the residential development of approximately 400 dwellings now.</p> <p>Further strategic releases from the Green Belt are required (notably at Shenstone) if the identified housing needs are to be fully met within the plan period and the strategic objectives of the plan realised.</p>	Comments noted. Green Belt Review is part of the evidence which supports the Local Plan. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO975	Mark Rose (Define Planning & Design) on behalf of Bloor Homes (Max Whitehead)	Whole document	<p>Promoting a site at Fossey Lane, Lichfield for 400 dwellings at 37dph and represents an excellent opportunity for the delivery of a strategic urban extension.</p> <p>Site was submitted through 'Call for Sites' consultation undertaken by LDC in November 2018 and was accompanied by a Vision Document that highlighted the merits and capacity of the site as a future strategic urban extension.</p> <p>Masterplan demonstrates the sites ability to deliver improvements to local highway network, provide range of house types, sizes and tenures as well as affordable housing. Further evidence has since been carried out and can be summarised as follows:</p> <p>Landscape - Site is not subject to any specific landscape designations and no features that elevate it to a valued landscape. Scheme would reflect and enhance the local landscape character with limited impact.</p> <p>Green Belt - Site makes a moderate contribution towards the purpose of the Green Belt, with only 4 sites out of 15 on the edge of Lichfield making a moderate contribution to Green Belt Purpose - the rest making an important contribution.</p> <p>Heritage - No designated heritage assets within immediate surrounding area. The southwestern part of the study site is mapped as forming part of Aldershawe Hall landscape park in the early 20th century. This land was subsequently used as a cricket ground before being given over to agricultural use in the later 20th century. The Concept Masterplan has sought to restore areas of parkland by incorporating parts of the mapped parkland within the proposed public open space.</p> <p>Ecology/ Biodiversity - Proposed development would not result in any detrimental effects on statutory or non-statutory designated sites of nature conservation interest. Further surveys are required. There is no overriding ecological constraint to the allocation of the site for development.</p> <p>Flood Risk and Drainage - Site is within Flood Zone 1 where there is a low probability of flooding. The site is also at a low risk of flooding from other sources, other than a small area that subject to surface water flooding but that is to remain undeveloped.</p> <p>Transport - The site is well located to encourage existing and future residents to adopt more sustainable travel habits, minimising reliance on private cars and increasing trips on-foot, by bike and using public transport.</p>	Commented noted. Detail of site promotion noted.
LPRPO976	Roslyn Moore	Policy SHA2: Strategic housing allocation land west of Fazeley	Strongly object to proposal to build 800 homes. The land is Green belt and the proposals have not considered traffic implications and the pressure this would place on existing amenities.	Comments noted. Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO977	John Maguire	Policy ONR1: Green Belt	<p>Object to the removal of land west of Coulter Lane from the Green Belt, the removal of which cannot be reasonably justified. Leader of the Council supported by his deputy specifically said as a matter of record and witnessed by hundreds of people that the land 'would never be built on' so why remove it from the plan (BAG meeting in Burntwood Friday 10th January 2020).</p> <p>It is a fact that the removal of the land will facilitate development of the site. The infrastructure around Coulter Lane will not cope with any housing development. Traffic on any new site would inevitably only travel toward commercial centres of employment to Lichfield, Birmingham, Brownhills and Cannock. The proposed area and its lanes/roads already struggle with increased traffic. There is minimal public transport in the area. Increased traffic would destroy the surrounding lanes but would also be highly dangerous to pedestrians and cyclists as there are no paths or passing points. There would be a huge increase in physical and environmental danger to parents and children who attend Fulfen Primary School.</p> <p>If land has to be identified due to government housing requirements and development pressures then I argue there are better locations to consider. While it may be unpopular land west of Hammerwich is far more suitable, surrounded by road infrastructure and could be designed in a way that protects the green fields around Hammerwich. It is a mirror site of the Coulter Lane proposal but already has obvious and necessary traffic infrastructure. It would not increase danger from additional cars and air pollution.</p> <p>In addition there is another obvious site which would help preserve Green belt, the blue hoarding site aka the Town Centre. I understand this is within the town centre designation - this is nothing more than idealistic vision, reality and housing needs should take priority. Lichfield has greater facilities and failed to attract enough commercial partnership to develop its town centre so how will Burntwood do so? While aspirations are admirable it is irresponsible to overlook realities. The blue hoarding site should be used for additional housing to compliment existing developments.</p>	Comments noted. The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO978	Jamie Roberts (Tetlow King) on behalf of Rentplus UK	Policy OHF2: Providing a balanced housing market and optimising housing density	The Council's approach to housing mix is welcomed as it aims to encapsulate all forms of affordable housing, whilst remaining flexible. By taking a flexible approach, the Council will be better placed to facilitate the delivery of affordable housing across all types and tenures, including through other affordable routes to home ownership as required by the Framework.	Comments noted
LPRPO979	Jamie Roberts (Tetlow King) on behalf of Rentplus UK	Policy OHF4: Affordable Housing	For soundness, and in order to be consistent with national planning policy, it is recommended that Strategic Policy OHF4, which sets out the Council's overall approach to securing affordable housing, fully reflects paragraph 64 of the NPPF. That paragraph requires major developments to provide at least 10% of the homes as available for 'affordable home ownership' (subject to certain exemptions as listed in the NPPF).	Comments noted, affordable housing policy is justified through evidence.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO980	Joe Breen	Policy ONR1: Green Belt	<p>I object to the parcel of Green Belt land lying west of Coulter Lane in Burntwood being removed from the Green Belt and being designated as an Area of Development Restraint (ADR) for a number of reasons as follows:</p> <p>1) Designating an area land as ADR does not necessarily mean that development will occur immediately or in the near future, designating it as ADR will mean that it is identified as possible land for development when required in the future. This opens up a great roll that the land will become used for development in the future even though this has not been specifically confirmed yet.</p> <p>2) Believe that the Green Belt land is of significant importance to the Green belt and is not of just moderate importance to the Green Belt. I believe that the Green Belt land should be re-classified to being of significant importance.</p> <p>3) I believe that removing the Green Belt Land from the Green Belt and allocating it as an ADR will result in the eventual development of houses on the Green Belt Land, despite this not being confirmed at present. As mentioned above, there is a need for another 400 homes to be built in the Burntwood area, and developers will be extremely keen to use this ADR land to develop the 400 houses on. If this happens, this will have a very detrimental effect on the current local residents in the area.</p> <p>4) Removing the land from the Green Belt Land and allocating as ADR will be extremely unpopular with local residents. There is no requirement for LDC to use the land in question when there are many other parcels of land in Burntwood which are not in the Green Belt and are in the Brown Belt.</p>	<p>Comments noted. The document identifies areas of 'Safeguarded Land' as defined within national policy. National policy states that consideration should be given that where changes to the Green Belt boundary are being proposed then areas of land between the urban area and the Green Belt (Safeguarded Land) should be identified to ensure the Green Belt boundary is capable of enduring beyond the plan period. The preferred options document identifies areas of such safeguarded land in conformity with national planning policy.</p>
LPRPO981	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy OSS2:Our Spatial Strategy	<p>The settlement hierarchy should recognise west of Tamworth as a sustainable location for growth within Lichfield District. Tamworth is a large market town which benefits from a number of services and facilities. Overall settlement hierarchy is generally supported. The spatial strategy should identify the strategic levels of growth for both housing and economic growth across the District in line with the settlement hierarchy</p>	<p>Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.</p>
LPRPO982	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Section 10: Our sustainable communities	<p>The approach to sustainable development set out in Policy OSC1 is generally supported where it is consistent with national policy. However, certain aspects of the policy as currently drafted should be refined. In particular, the policy wording in relation to air quality is currently unclear. Policies OSC4 and OSC5 are generally supported, but need to be amended to be in accordance with national guidance.</p>	<p>Comments noted. Policy wording to be considered in light of evidence supporting the local plan.</p>
LPRPO983	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy INF1: Delivering our Infrastructure	<p>Policy INF1 is aimed to providing the infrastructure required by the District's communities and businesses and safeguarding existing infrastructure. This is supported; however, it is considered there needs to be additional evidence published in support of the Local Plan Review regarding infrastructure in order to provide clarity over what additional infrastructure is required to support the allocations within the Local Plan Review and how these will be delivered. Without such evidence, the viability and deliverability of such allocations is questionable</p>	<p>Comments noted. Further evidence in relation to infrastructure will support the local plan review process.</p>
LPRPO984	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Chapter 12: Our Sustainable Transport	<p>The approach to sustainable transport set out in the policies in this section is broadly supported. However, the requirement for all major development proposals to produce a travel plan is too onerous for smaller developments as it would apply to all development of 10 or more dwellings. This threshold should be revised to a higher level. It is noted that parking provision will continue to be determined with reference to the Sustainable Development Supplementary Planning Document (SPD). This is not in line with national policy and should be reviewed. It is noted that the policy provides greater flexibility for the provision of parking to be considered for specific development proposals and this is supported.</p>	<p>Comments noted. Supplementary Planning Documents supported the adopted local plan. Revision to or new SPD's will be considered in due course following the local plan review.</p>
LPRPO985	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy OEET1: Our employment and economic development	<p>This policy states that approximately 61 hectares of land will be allocated for employment use in accordance with the Housing and Economic Development Needs Assessment 2019. It is not clear why the current consultation document has not identified any employment sites and it should be clarified how the Council intends to deliver its employment land needs. Land South of Bonehill Road is a site that can assist in meeting this identified need. Overall the Council's aspirations for economic growth are welcomed by Richborough Estates as part of a balanced sustainable strategy.</p>	<p>Comments noted. Employment allocations will be established through the further stages of the local plan review.</p>

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO986	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy ONR1: Green Belt	<p>As currently drafted, the policy covers both strategic and development management matters related to Green Belt. It is suggested it would be clearer to separate strategic and development management concerns into separate policies. Furthermore, reference is made to national Green Belt policy. However, the policy wording itself then does not reflect national policy. This should be rectified.</p> <p>In terms of the strategic approach to the Green Belt there is an acceptance that there needs to be changes to the Green Belt boundary to accommodate growth requirements at Whittington and Fazeley. Green Belt release needs to be made to deliver a sustainable spatial strategy.</p> <p>The plan also designates three ADRs to be removed from the Green Belt to ensure that the Green Belt boundary is capable of enduring beyond the plan period. The identification of ADR land is supported, however, it is not clear why only three ADRs have been identified and it is questioned whether this will be sufficient to ensure Green Belt boundaries endure beyond 2040, as per the requirements of the NPPF.</p> <p>Policy ONR1 goes on to propose new Green Belt land to define the northern extent of Lichfield city and prevent the coalescence of Lichfield and Fradley. For the proposed new Green Belt between Lichfield city and Fradley it needs to be clearly demonstrated that this meets the relevant tests within the NPPF</p>	<p>Comments noted. The document identifies areas of 'Safeguarded Land' as defined within national policy. National policy states that consideration should be given that where changes to the Green Belt boundary are being proposed then areas of land between the urban area and the Green Belt (Safeguarded Land) should be identified to ensure the Green Belt boundary is capable of enduring beyond the plan period. The preferred options document identifies areas of such safeguarded land in conformity with national planning policy.</p>
LPRPO987	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Chapter 16: Our Natural Resources	<p>The approach to habitats and biodiversity set out within Policy ONR2 is generally supported where it is consistent with national policy.</p> <p>Policy ONR5 addresses natural and historic landscape. In Lichfield District, there is a single area of landscape which is nationally valued; Cannock Chase Area of Outstanding Natural Beauty (AONB). It is therefore not clear why this policy makes reference to the Green Belt and should instead focus on the AONB and its immediate surroundings. Any policy text regarding beneficial use of the Green Belt should logically be included in the Green Belt policy (ONR1).</p>	<p>Support noted.</p>
LPRPO988	Mark Rose (Define Planning & Design) on behalf of Bloor Homes (Max Whitehead)	Policy OSS2: Our Spatial Strategy	<p>Housing requirement of 11,800 dwellings with the figure being derived from the Local Housing Need (LHN) of 7,282 dwellings plus a contribution of 4,500 dwellings towards meeting the GBBCHMA shortfall. Welcomes LDC's intention to positively plan for the needs of the District and neighbouring Local Authorities, there is evidence to suggest that the LDC should consider an uplift to the LHN to address issues of affordability and an ageing population. There is also justification for raising the level of housing proposed to help to address the GBHMA shortfall.</p> <p>Agrees that the preferred spatial strategy, based on the settlement hierarchy set out within the policy, would be an appropriate approach to meeting the identified housing needs in the plan period, in a manner that appropriately reflects the geography of the Borough and the distribution of the unmet needs from the wider HMA. It is also critical that the identification and allocation of development sites properly and fully reflects the spatial strategy. Currently that is not the case as grossly insufficient provision is proposed at key sustainable settlements such as Shenstone and Burntwood.</p>	<p>Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.</p>
LPRPO989	Mark Rose (Define Planning & Design) on behalf of Bloor Homes (Max Whitehead)	Policy NS1: New settlement	<p>Welcomes LDCs intention to "look ahead over a minimum of a 15 year period from adoption to anticipate and respond to long-term requirements and opportunities", but also the recognition in doing so that a new settlement would not start deliver any housing within this plan period and, therefore, not address the District's LHN.</p>	<p>Comments noted. Policy and explanatory text make clear that new settlement is unlikely to deliver growth in the current plan period.</p>
LPRPO990	Mark Rose (Define Planning & Design) on behalf of Bloor Homes (Max Whitehead)	Policy OSC4: High Quality Design	<p>Supports the intent of Policy OSC4 however PPG states that policies relating to design should go beyond merely repeating guidance set out in the NPPF. Policy is imprecise and lacks clarity. Consequently this policy would be open to wide interpretation and difficult to effectively apply in the development management process.</p> <p>Recognises and welcome the aspiration of Strategic Policy OSC4 in regards to energy efficiency and carbon reduction. However, policy must be sufficiently flexible to allow for location and context- specific considerations to be taken into account. Blanket application of such aspirational policy requirements may compromise otherwise sustainable development.</p> <p>Furthermore, the policy should allow greater flexibility by including reference to the potential inclusion of alternative measures to mitigate climate change. For example, Bloor Homes 'fabric first' approach when compared to renewable technologies there is no maintenance required, and it avoids the concerns as to whether the technologies are actually being used.</p>	<p>Comments noted. There is no statutory planning requirement to include a 'buffer' on top of the housing requirement. The preferred options document does state that a buffer to ensure flexibility in supply will be applied. Further evidence in terms of housing supply will be prepared and inform the local plan review.</p>
LPRPO991	Mark Rose (Define Planning & Design) on behalf of Bloor Homes (Max Whitehead)	Policy INF1: Delivering our Infrastructure	<p>This policy confirms the Council will work with infrastructure providers, agencies, organisations and funding providers to enable delivery of infrastructure. An Infrastructure Delivery Plan will be published to support and direct infrastructure requirements. Realistic infrastructure costs should be established to identify whether the allocations are viable and developable during the plan period.</p>	<p>Comments noted.</p>

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO992	Mark Rose (Define Planning & Design) on behalf of Bloor Homes (Max Whitehead)	Policy OST1: Our sustainable transport & Policy OST2: Sustainable travel	<p>Welcomes the intention of Strategic Policy OST1 to improve accessibility to and choice of a wide range of transport choice.</p> <p>However, the principles of Strategic Policy OST1, which align with the key principles of sustainable development and the imperatives of the NPPF, are not realised through the provision of strategic housing allocations within Strategic Policy OHF1.</p> <p>Namely, the limited residential development within the settlement of Shenstone, a settlement that offers an excellent and frequent train link with both Birmingham (30 minutes journey) and Lichfield City (7 minute journey) and bus services to Lichfield, Burton and Sutton Coldfield, is not in accordance with the policy requirements as set out within this policy. In this light, Strategic Policies OST1 and OST2 are undermined by Policy OHF1.</p>	Comments noted. A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO993	Mark Rose (Define Planning & Design) on behalf of Bloor Homes (Max Whitehead)	Policy OHF1: Housing Provision	<p>Critical that LDC ensure that the actual allocations made in the document ensure that the minimum housing need is actually met, and in doing so that the provision fully reflects the spatial strategy, addressing the needs of those key settlements identified as being most suitable to accommodate growth (such as Shenstone). Flexibility - A flexible contingency of 20% (as per the Local Plan Advisory Group's recommendation) should be applied to the overall housing land supply to ensure that the LHN is recognised and treated as a minimum rather than a maximum figure. In this light, the LDLP should plan for the delivery of 14,160 dwellings by allocating additional development sites, which would include the Areas of Development Restraint (ADR) that are proposed to be safeguarded for future development, and other suitable sites such as to the east of Shenstone, which would fully realise the proposed spatial strategy. Realistic Delivery Assumptions - note the considerable dependence on the delivery of housing to the north-east of Lichfield in the spatial strategy ; which represents 28% of the overall housing requirement of the District in the period to 2040 which will be complicated to deliver. LPR must take a realistic view of the timescale of the sites delivery. LDC must include a trajectory illustrating expected rate of housing delivery over the plan. If anticipated delivery will not meet the housing requirement then the document will need to allocate additional development sites. It should not be presumed that previously allocated sites should be allocated again. No evidence of the audit undertaken to confirm that the sites allocated that have not yet come forward are still 'deliverable' and 'developable'. LDC must ensure continual supply of housing from a substantial portfolio and a 5 year supply of deliverable housing land supply at the point of LDCs adoption and a rolling supply thereafter. Shenstone – Currently the scale of growth identified at Shenstone in Table 13.1 is wholly insufficient and does not accord with the spatial strategy or the objectives of the document as a whole. The suitability of Shenstone for large-scale development is evident. Shenstone contains a wide variety of local services and community facilities. Furthermore, the settlement benefits from excellent transport accessibility. Significant development in the settlement would be in accordance not only with the Spatial Strategy, Settlement Hierarchy, and the needs of the wider HMA, but would also promote sustainable travel in accordance with Strategic Policies OST1 and OST2. There is provision only for 100 dwellings within Shenstone, not sufficient for a sustainable settlement such as Shenstone. LPR makes limited provision within the southern part of the District despite the unmet need of the District and GBBCHMA. SGBHMA Strategic Growth Study identified around Shenstone as a preferred option for a 'New Settlement'. Contents that a strategic allocation at Shenstone should be supported in the next iteration of the LPR, a development for 1,000 dwellings phased in Shenstone would bolster the Districts land supply and support the settlement.</p>	Comments noted. There is no statutory planning requirement to include a 'buffer' on top of the housing requirement. The preferred options document does state that a buffer to ensure flexibility in supply will be applied. Further evidence in terms of housing supply will be prepared and inform the local plan review.
LPRPO994	Mark Rose (Define Planning & Design) on behalf of Bloor Homes (Max Whitehead)	Policy OHF2: Providing a balanced housing market and optimising housing density	<p>Support Strategic Policy OHF2 in principle but policy should allow a degree of flexibility to take into account the site and context characteristics as well as market demand in locality to ensure the housing mix is justified.</p> <p>Inappropriate therefore to include a preferred mix table within policy as it does not reflect the issues that indicate that a site specific approach would be more effective when considering a balanced housing provision. This is reflected in Policy OHF2 which states that types, tenures and sizes of houses delivered should 'reflect and respond to latest housing needs and demands of the district'; a sentiment that is supported.</p> <p>Essential that the difference between need and demand is recognised in the Local Plan, for example the need for smaller households might be for smaller properties, the actual demand is commonly still for larger properties. Contents that the preferred housing mix table should be removed from Policy OHF2.</p>	Comments noted. Policy seeks to provide a balanced housing market within the district and provide a mix of dwellings to meet evidenced need.
LPRPO995	Mark Rose (Define Planning & Design) on behalf of Bloor Homes (Max Whitehead)	Policy OEET1: Our employment and economic development	<p>Supports LDCs intention to maintain and seek to diversify its local economy by allocating 61ha of land for employment. Settlements such as Shenstone are suitably located to accommodate additional employment provision that both meets the needs of the District whilst contributing towards the unmet employment need of the wider HMA.</p>	Comments noted. The council continues to gather evidence in support of the local plan. Further viability evidence will be gathered to inform the further stages of the local plan.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO996	Mark Rose (Define Planning & Design) on behalf of Bloor Homes (Max Whitehead)	Policy OHF4: Affordable housing	<p>Fully supports the provision of affordable housing an integral part of housing development to meet the areas affordable housing needs. Policy seems to indicate that the maximum level of provision will be sought on a site by site basis, presumably based on a viability appraisal undertaken at the application stage. However, this approach is contrary to the NPPF.</p> <p>Policy OHF4 must seek to set a fully justified and clear affordable housing requirement (both the quantum and mix). That will provide the land owners and developers with the certainty they required to ensure the delivery of the sustainable development of the proposed allocation sites needed to address the identified market and affordable LHN.</p> <p>If a higher level of affordable housing is required than can be feasibly delivered in the proposed developments, then a higher level of overall housing provision should be sought to address that aspiration.</p>	Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO997	Mark Rose (Define Planning & Design) on behalf of Bloor Homes (Max Whitehead)	Policy ONR1: Green Belt	Supports proposed amendments to Green Belt in order to release sites for residential development to address local housing need. However, further strategic releases are required particularly at Shenstone if the identified housing needs are to be fully met within the plan period and the strategic objectives realised.	Comments noted. A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO998	Mark Rose (Define Planning & Design) on behalf of Bloor Homes (Max Whitehead)	Policy SHA1: Strategic housing north of Lichfield	<p>Housing delivery strategy largely relies on the timely delivery of 3,300 homes at the strategic housing allocation north of Lichfield. Reliance on such a significant strategic allocation is particularly risky in relation to meeting the LHN within the plan period and maintaining a five year supply of housing as, by their very nature, large sites are complicated to deliver and can often be subject to delays and reduced delivery rates. LDC must include a trajectory illustrating the expected rate of housing delivery over the plan period in this key development based on a reasonable assessment of lead in times and delivery rates.</p> <p>For sites of 2,000+ dwellings research shows, the average Total Development Timescale (from the submission of the first planning permission to the delivery of the first dwelling on site) is 8.5 years. Using that assumption and that a planning application would immediately follow the adoption of the document, delivery on site would likely begin in 2030/31 which would afford 9/10 years of delivery within the remaining plan period, meaning the site would be extremely unlikely to build out to its full capacity by the end of the plan period leading to unmet housing need in the District which should be addressed by allocation additional sites.</p>	Comments noted. A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO999	Mark Rose (Define Planning & Design) on behalf of Bloor Homes (Max Whitehead)	Section 20: Larger Service Villages Our Vision for Shenstone	<p>Objects to the Vision for Shenstone, considerable development should be accommodated within the settlement to ensure its sustainability into the long term.</p> <p>Proposing site east of Shenstone to deliver approx. 1,000 dwellings at 30-35dph. Could provide a range of house types, sizes and tenures, provide a substantial proportion of affordable housing. Deliver 1.85ha of employment land in a highly accessible location close to the A5 and M6 Toll. Provide key facilities including a primary school, recreational facilities and play area. Deliver local highway improvements and a relief road to provide a strategic connection to the A5.</p> <p>Landscape evidence has been undertaken and the site is not subject to any landscape designations. In terms of Green Belt the site scores favourably when compared to other potential development sites across the District. Subject to appropriate migratory measures, the site's development would be in accordance with Strategic Policy OBHE1, in that it would protect and improve the built environment, whilst having special regard to the conservation and enhancement of the historic environment.</p> <p>Ecological appraisal has been undertaken and concludes that the proposed development would not result in any detrimental effects on statutory or non-statutory designated sites of nature conservation interest.</p> <p>Flood Risk and Drainage Strategy Report that highlights that the site is mainly within Flood Zone 1 where there is a low probability of flooding, and those parts of the site within the Black Brook corridor that lie within Flood Zone 2 & 3 are to be retained as public open space within the green infrastructure network. SHLAA scoring suggests the site is within or partially within Flood Zone 3a. However it does not consider that flood risk is able to be mitigated through sensitive siting of residential areas.</p> <p>Encourages LDC to remove the site to the east of Shenstone from the Green Belt and allocate it for development of a strategic urban extension.</p>	Comments noted. A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO1000	Environment Agency (Samuel Penford)	Policy OSC5: Flood risk, sustainable drainage & water quality	<p>Consider the policy could be worded more strongly to take on board the recommendations from the Councils SFRA Level 1 2019 and the NPPF. Reiterate some of recommendations made previously. We note the policy references steering development away from areas of highest flood risk and ensuring development within those areas undertake a site specific flood risk assessment.</p> <p>Recommend that the wording of the policy is extended so that 'all developments' incorporate SuDS not just 'major developments'.</p> <p>We recommend the inclusion of the following point to this policy: "Land that is required for current and future flood management will be safeguarded from development. Where development lies adjacent to or benefits from an existing or future flood defence scheme the developer will be expected to contribute towards the cost of delivery and/or maintenance of that scheme".</p>	Comments noted. Draft policy wording based upon ongoing engagement with the Environment Agency and Staffordshire County Council.

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LPRPO1001	Environment Agency (Samuel Penford)	Policy OHF3: Accommodation for gypsies and traveller provision	The location of site allocations in this policy includes "the site should be located within flood zones 1 or 2". It should be observed that Caravans, Mobile Homes and Park Homes intended for permanent residential use are classified as "highly vulnerable" in accordance with Table 2 of the Planning Practice Guidance: Flood Risk and Coastal Change. Highly vulnerable development is only appropriate in Flood Zone 2 on completion of the Exception Test.	Comments noted. Additional explanatory text to be considered to make clear that such users are classified as 'highly vulnerable'.
LPRPO1002	Environment Agency (Samuel Penford)	Policy SHA1: Strategic housing north of Lichfield	The Curborough Brook, an ordinary watercourse lies on the western boundary of the site. We recommend that the red line boundary of the site is extended to incorporate the Brook so that a reduction in flood risk can be gained through development of this site. The LLFA should be consulted regarding flood risk from the Curborough Brook. The Design requirements should be expanded so that the Masterplan not only requests that "...no properties at risk of flooding now and in the future" but "opportunities to reduce flood risk in the wider area" should be sought. This applies to the other proposed site allocations listed in the Plan.	Comments noted. Masterplan text or explanatory text will be considered and updated in respect of flood risk.
LPRPO1003	Environment Agency (Samuel Penford)	Policy SHA2: Strategic housing allocation land west of Fazeley	The Bourne Brook (Main River) lies on the southern boundary of the site. We recommend the inclusion of the following Design requirement: "There should be no built development within 8m from the top the Main River for the preservation of the watercourse corridor, wildlife habitat, flood flow conveyance and future watercourse maintenance or improvement". Again, we recommend that the boundary of the site is extended to incorporate the Main River so that we can influence flood risk and environmental betterment in the area.	Comments noted. Masterplan text or explanatory text will be considered and updated in respect of flood risk.
LPRPO1004	Environment Agency (Samuel Penford)	Policy SHA3: Strategic housing allocation land north and south of Hay End Lane	There are a few ordinary watercourses within the site. We recommend that the LLFA is consulted regarding the flood risk from these watercourses.	Comments noted. Staffordshire County Council have been consulted in respect of the local plan review.
LPRPO1005	Environment Agency (Samuel Penford)	Policy SHA4: Strategic housing land allocation land off Huddlesford Lane	The site is located in Flood Zone 1. The Birmingham and Fazeley canal is located approximately 100m to the north of the site. The residual risk of a breach in the canal defences must be considered as part of a site-specific FRA.	Comments noted.
LPRPO1006	Environment Agency (Samuel Penford)	Policy SHA1: Strategic housing north of Lichfield	Do not consider that the locations of the preferred options for development are likely to have significant environmental effects from a groundwater perspective. The area is not within a groundwater source protection zone. In planning any development in this area reference should be made to our 'Groundwater Protection: Principles and Practice (GP3) document.	Comments noted.
LPRPO1007	Environment Agency (Samuel Penford)	Policy SHA2: Strategic housing allocation land west of Fazeley	Southern part of the area is located within the total catchment (Zone 3) of a groundwater protection zone, designated for public water supply borehole. Source protection zones are designated to protect the quality of groundwater abstractions used for drink water. Within such zones certain activities may be restricted, for example underground storage of hazardous substances. Small historic landfills are noted within this housing allocation location. Should areas proposed for development be located on sites which have been subject to land use(s) which have the potential to have caused contamination of the underlying soils and groundwater then any Planning Application must be supported by a Preliminary Risk Assessment.	Comments noted. Information relating to area of proposed allocation noted.
LPRPO1008	Environment Agency (Samuel Penford)	Policy SHA3: Strategic housing allocation land north and south of Hay End Lane	The area covered by this strategic housing growth location is located on the bedrock of the Mercia Mudstone Formation, designated as a Secondary B Aquifer by the Environment Agency. Secondary B Aquifers are predominantly lower permeability layers which may store and yield limited amounts of groundwater due to localised features such as fissures. Superficial deposits are present over part of the area, in form of Glaciofluvial sands and gravel deposits, which are designated as a Secondary A Aquifer. The area is not within a groundwater Source Protection Zone. Several surface water features are indicate to be present within the area, in from of ponds, lagoons and unnamed watercourses.	Comments noted. Information relating to area of proposed allocation noted.
LPRPO1009	Environment Agency (Samuel Penford)	Policy SHA4: Strategic housing land allocation land off Huddlesford Lane	The area is also located within the total catchment (Zone 3) of a groundwater Source Protection Zone, designated for a public water supply borehole at Trent Valley. Source Protection Zones are designated to protect the quality of groundwater abstractions used for drinking water purposes. Within Source Protection Zones certain activities may be restricted. Government Policy, as detailed in the National Planning Policy Framework (paragraph 178), states that 'where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner'. Consequently should a development site currently or formerly have been subject to land-use(s) which have the potential to have caused contamination of the underlying soils and groundwater then any Planning Application must be supported by a Preliminary Risk Assessment.	Comments noted. Information relating to area of proposed allocation noted.
LPRPO1010	Environment Agency (Samuel Penford)	Policy OSC1: Securing sustainable development	Agree with the overall policy but suggest minor word changes to include all blue infrastructure.	Comments noted. Additional wording will be considered for inclusion.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO1011	Environment Agency (Samuel Penford)	Policy ONR1: Green belt	Conversely, there is a general assumption that Green Belt land will automatically have a high biodiversity value, however agricultural practises can have negative impacts upon watercourses. We welcome opportunities to integrate the re-naturalisation of watercourses in areas of green belt release, where appropriate.	Comments noted. Policy makes no reference to biodiversity in respect of Green Belt designation.
LPRPO1012	Environment Agency (Samuel Penford)	Chapter 16: our natural resources	We are concerned particularly with the wording with Strategic Policy ONR4, as it appears to discourage infiltration based SuDS techniques in favour of discharging surface waters into the canal as a water source. We recommend that the wording of your draft Strategic Policy ONR4 be amended to bring it in line with adopted CP3 with the aim of protecting groundwater resources by diverting surface water run-off to ground where possible to ensure that recharge of the threatened underlying aquifer is maintained.	Comments noted. Wording of policy to be reviewed and suggested changes considered.
LPRPO1013	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Chapter 7: Our vision	Overall, the Local Plan Review document would benefit from clearer referencing throughout in order to clearly demonstrate how the spatial strategy relates back to the Vision, Strategic Objectives and Priorities, as well as to its evidence base. At present there is a lack of detail in the Plan which is needed to demonstrate the viability and deliverability of the strategy and robust evidence will need to be produced to enable meaningful engagement to ensure a sound plan. The 'Policies Map' should currently be referred to as a 'Proposals Map' until the Plan is adopted.	Comments noted. Submission document will include references and links to evidence base documents and links to strategic objectives.
LPRPO1014	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy OSS2:Our spatial strategy	The settlement hierarchy should recognise west of Tamworth as a sustainable location for growth within Lichfield District. Tamworth is a large market town which benefits from a number of services and facilities. Overall settlement hierarchy is generally supported. The spatial strategy should identify the strategic levels of growth for both housing and economic growth across the District in line with the settlement hierarchy	Comments noted. Settlement hierarchy is based upon evidence which identifies the hierarchy of settlements within Lichfield District. Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO1015	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy OSC1: Our Sustainable Communities	The approach to sustainable development set out in Policy OSC1 is generally supported where it is consistent with national policy. However, certain aspects of the policy as currently drafted should be refined. In particular, the policy wording in relation to air quality is currently unclear. Policies OSC4 and OSC5 are generally supported, but need to be amended to be in accordance with national guidance.	Comments noted.
LPRPO1016	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy INF1: Delivering our Infrastructure	Policy INF1 is aimed to providing the infrastructure required by the District's communities and businesses and safeguarding existing infrastructure. This is supported; however, it is considered there needs to be additional evidence published in support of the Local Plan Review regarding infrastructure in order to provide clarity over what additional infrastructure is required to support the allocations within the Local Plan Review and how these will be delivered. Without such evidence, the viability and deliverability of such allocations is questionable.	Comments noted. Further evidence in relation to infrastructure will support the local plan review process.
LPRPO1017	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy OST1: Our Sustainable Transport	The approach to sustainable transport set out in the policies in this section is broadly supported. However, the requirement for all major development proposals to produce a travel plan is too onerous for smaller developments as it would apply to all development of 10 or more dwellings. This threshold should be revised to a higher level. It is noted that parking provision will continue to be determined with reference to the Sustainable Development Supplementary Planning Document (SPD). This is not in line with national policy and should be reviewed. It is noted that the policy provides greater flexibility for the provision of parking to be considered for specific development proposals and this is supported.	Comments noted.
LPRPO1018	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy OHF1: Housing Provision	There are four strategic development allocations/areas listed in Policy OHF1 alongside the approximate number of new homes they will deliver. These allocations reflect the new allocations for growth set out in Strategic Policy OSS2. However, it is not clear how the proposed allocations relate to the spatial strategy or settlement hierarchy. Additionally, there is no reasoning which sets out the inconsistency with the current adopted spatial strategy. The proposed levels of growth vary significantly between settlements, including between those at the same level in the settlement hierarchy. It is not clear how the spatial strategy has led to this and this needs to be demonstrated and justified, along with further details (and requirements and potential allocations) relating to those settlements which have been omitted., the current strategy is heavily reliant on a single large site to deliver the overall housing requirement (land north-east of Lichfield) However, this is not supported by detailed evidence to show that work has progressed sufficiently to demonstrate deliverability of this during the plan period. Concern has already been raised within this representation concerning the infrastructure requirements and deliverability issues in relation to the provision of a new settlement. These concerns are equally applicable to the allocation of 3,300 new dwellings in a single location north-east of Lichfield. Further commentary on this allocation is provided later in this Representation, in respect of Policy SHA1.	Comments noted. Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO1019	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy OHF2: Providing a balanced housing market and optimising housing density	<p>Richborough Estates is concerned that, in its current form, this policy lacks sufficient flexibility to meet changing housing needs across the District and across the plan period, by referring to specific percentage figures.</p> <p>In seeking to specify a mix, the policy lacks flexibility to reflect differences across the District's sub-market areas; changing needs over the plan period and site-specific considerations which will often influence the mix that can be delivered on individual sites.</p> <p>Furthermore, this plan proposes 4,500 additional homes to meet the needs of the GBBCHMA. The housing needs of neighbouring authorities will accordingly also be crucial consideration in determining housing mix on developments meeting cross boundary requirements. Policy OHF2 should contain flexibility to reflect this. The policy also sets out minimum net density of 35 dwellings per hectare. This is considered to be broadly appropriate. Developments in Lichfield City, Burntwood Town and locations with good public transport links will be expected to achieve higher densities of approximately 50 dwellings per hectare. It is questioned if this is actually achievable, or indeed appropriate on many sites in Lichfield and Burntwood, particularly those outside of the centres where regard should also be had to context and setting. It is suggested that an amendment to the policy to focus this higher level of density upon centres, with more flexibility to the wider urban areas (see NPPF paragraph 123 a) would be a more sensible approach.</p>	Comments noted. Evidence within the HEDNA suggests the Council will be justified in seeking to achieve as much affordable housing as viably possible on appropriate development sites. Further viability evidence is being collected which will inform the policy and provide a clear position in terms of the appropriate level of affordable housing to be sought.
LPRPO1020	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy OHF4: Affordable Housing	The lack of a specific affordable housing threshold in the policy does not accord with either the NPPF or the Viability and Plan Making section within PPG. National policy clearly requires a Local Plan to set an affordable housing percentage which this policy currently lacks. The policy also seeks to allow flexibility in the tenure, size and type of affordable housing on a scheme by scheme basis. This flexibility is supported and should be delivered with reference to the most up-to-date Strategic Housing Market Assessment (SHMA).	Comments noted. Evidence within the HEDNA suggests the Council will be justified in seeking to achieve as much affordable housing as viably possible on appropriate development sites. Further viability evidence is being collected which will inform the policy and provide a clear position in terms of the appropriate level of affordable housing to be sought.
LPRPO1021	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy OEE1: Our employment and economic development	This policy states that approximately 61 hectares of land will be allocated for employment use in accordance with the Housing and Economic Development Needs Assessment 2019. It is not clear why the current consultation document has not identified any employment sites and it should be clarified how the Council intends to deliver its employment land needs. Land South of Bonehill Road is a site that can assist in meeting this identified need. Overall the Council's aspirations for economic growth are welcomed by Richborough Estates as part of a balanced sustainable strategy.	Comments noted. Employment allocations will be established through the further stages of the local plan review.
LPRPO1022	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy Our Healthy and Safe Communities	The approach to healthy and safe communities in Policy OSHC1 is generally supported. However, the policy states that health and education infrastructure requirements related to strategic development proposals will need to be understood and determined through the Local Plan and accompanying evidence base. Further work is needed on the evidence base and in relation to viability testing regarding infrastructure.	Comments noted. The council continues to gather evidence in support of the local plan. Further viability evidence will be gathered to inform the further stages of the local plan.
LPRPO1023	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy ONR1: Green Belt	<p>As currently drafted, the policy covers both strategic and development management matters related to Green Belt. It is suggested it would be clearer to separate strategic and development management concerns into separate policies. Furthermore, reference is made to national Green Belt policy. However, the policy wording itself then does not reflect national policy. This should be rectified.</p> <p>In terms of the strategic approach to the Green Belt there is an acceptance that there needs to be changes to the Green Belt boundary to accommodate growth requirements at Whittington and Fazeley. Green Belt release needs to be made to deliver a sustainable spatial strategy. The plan also designates three ADRs to be removed from the Green Belt to ensure that the Green Belt boundary is capable of enduring beyond the plan period. The identification of ADR land is supported, however, it is not clear why only three ADRs have been identified and it is questioned whether this will be sufficient to ensure Green Belt boundaries endure beyond 2040, as per the requirements of the NPPF.</p> <p>Policy ONR1 goes on to propose new Green Belt land to define the northern extent of Lichfield city and prevent the coalescence of Lichfield and Fradley.</p> <p>For the proposed new Green Belt between Lichfield city and Fradley it needs to be clearly demonstrated that this meets the relevant tests within the NPPF.</p>	Comments noted. The document identifies areas of 'Safeguarded Land' as defined within national policy. National policy states that consideration should be given that where changes to the Green Belt boundary are being proposed then areas of land between the urban area and the Green Belt (Safeguarded Land) should be identified to ensure the Green Belt boundary is capable of enduring beyond the plan period. The preferred options document identifies areas of such safeguarded land in conformity with national planning policy.
LPRPO1024	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy ONR2: Habitats and biodiversity	<p>The approach to habitats and biodiversity set out within Policy ONR2 is generally supported where it is consistent with national policy.</p> <p>Policy ONR5 addresses natural and historic landscape. In Lichfield District, there is a single area of landscape which is nationally valued; Cannock Chase Area of Outstanding Natural Beauty (AONB). It is therefore not clear why this policy makes reference to the Green Belt and should instead focus on the AONB and its immediate surroundings. Any policy text regarding beneficial use of the Green Belt should logically be included in the Green Belt policy (ONR1).</p>	Comments noted. Further evidence is being prepared in support of the Local Plan.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO1025	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy SHA1: Strategic housing allocation North of Lichfield	<p>Strategic Housing Allocation SHA1, located to the north-east of Lichfield, forms the principal housing allocation within the emerging Local Plan. The allocation proposes 3,300 new dwellings on land between two existing housing allocations allocated through the adopted Local Plan; Land North East of Watery Lane and Land at Streethay. Whilst development has started on the Streethay SDA, it has not commenced on the Watery Lane site. Given that the outline consent for the Watery Lane site was granted in February 2017 and Reserved Matters approval for the spine road and green infrastructure was only granted in August 2019, the Council will need to be satisfied that there are no underlying issues preventing delivery of this new wider allocation.</p> <p>There is a lack of evidence either in the Local Plan Review or in the supporting evidence base that the local infrastructure can be viably upgraded to accommodate a development of the scale proposed. Significant work is needed to demonstrate that the local (and strategic – A38) highway network along with other infrastructure such as schools and healthcare could be upgraded to support this level of growth. There will need to be significant input from the County Council, Highways England and other statutory stakeholders to ensure relevant modelling is undertaken to test the allocation and identify if the required infrastructure can be viably delivered. The absence of such evidence highlights questions over the deliverability of the proposed allocation. It is suggested that the Lichfield requirement should be distributed across various sites and settlements rather than concentrated on a single large allocation. This approach would provide greater flexibility and resilience in the delivery of the proposed spatial strategy.</p> <p>Such an appropriate alternative site is Land at Lichfield Road, Kings Bromley</p>	Comments noted. Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed. Policy SHA1 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO1026	Mark Rose (Define Planning & Design) on behalf of Bloor Homes (Max Whitehead)	Policy OSS2: Our Spatial Strategy	<p>Housing requirement of 11,800 dwellings with the figure being derived from the Local Housing Need (LHN) Of 7,282 dwellings plus a contribution of 4,500 dwellings towards meeting the GBCHMA shortfall. Welcomes LDC's intention to positively plan for the needs of the District and neighbouring Local Authorities, there is evidence to suggest that the LDC should consider an uplift to the LHN to address issues of affordability and an ageing population. There is also justification for raising the level of housing proposed to help to address the GBHMA shortfall. Agrees that the preferred spatial strategy, based on the settlement hierarchy set out within the policy, would be an appropriate approach to meeting the identified housing needs in the plan period, in a manner that appropriately reflects the geography of the Borough and the distribution of the unmet needs from the wider HMA. The Tamworth Local Plan recognises the Borough are unable to meet their own OAN and 1,825 dwellings will need to be delivered outside of the Borough. Support LDC's commitment to delivering a strategic allocation at Fazeley, in recognition of the unmet need arising within Tamworth Borough Council, but also as an entirely appropriate and sustainable location for development to meet housing needs from the District itself and the wider GBHMA.</p> <p>The Strategic Growth Study recognises the potential role of land to the north west and west of Tamworth (UE4) as a potential urban extension.</p>	Comments noted. Spatial strategy and proposed allocations along with committed supply considered sufficient to meet housing requirement established within preferred options document. The purpose of safeguarded land is set out within the NPPF. Considered to be in line with NPPF to identify such designations which are not for development within the plan period.
LPRPO1027	Mark Rose (Define Planning & Design) on behalf of Bloor Homes (Max Whitehead)	Policy NS1: New settlement	<p>Welcomes LDCs intention to "look ahead over a minimum of a 15 year period from adoption to anticipate and respond to long-term requirements and opportunities", but also the recognition in doing so that a new settlement would not start deliver any housing within this plan period and, therefore, not address the District's LHN.</p>	Comments noted. Policy and explanatory text make clear that new settlement is unlikely to deliver growth in the current plan period.
LPRPO1028	Mark Rose (Define Planning & Design) on behalf of Bloor Homes (Max Whitehead)	Policy OSC4: High Quality Design	<p>Supports the intent of Policy OSC4 however PPG states that policies relating to design should go beyond merely repeating guidance set out in the NPPF. Policy is imprecise and lacks clarity. Consequently this policy would be open to wide interpretation and difficult to effectively apply in the development management process.</p> <p>Recognises and welcome the aspiration of Strategic Policy OSC4 in regards to energy efficiency and carbon reduction. However, policy must be sufficiently flexible to allow for location and context- specific considerations to be taken into account. Blanket application of such aspirational policy requirements may compromise otherwise sustainable development.</p> <p>Furthermore, the policy should allow greater flexibility by including reference to the potential inclusion of alternative measures to mitigate climate change. For example, Bloor Homes 'fabric first' approach when compared to renewable technologies there is no maintenance required, and it avoids the concerns as to whether the technologies are actually being used.</p>	Comments noted. There is no statutory planning requirement to include a 'buffer' on top of the housing requirement. The preferred options document does state that a buffer to ensure flexibility in supply will be applied. Further evidence in terms of housing supply will be prepared and inform the local plan review.
LPRPO1029	Mark Rose (Define Planning & Design) on behalf of Bloor Homes (Max Whitehead)	Policy INF1: Delivering our Infrastructure	<p>Intent of INF1 is supported as it is critical that the future growth in the plan area is appropriately supported by the necessary community, highway and utilities infrastructure.</p> <p>Welcomes the recognition of the role of a wide range of actors in delivering infrastructure within the policy. However, this policy should be more explicit to encourage the proactive involvement of actors within infrastructure delivery. For example, the policy should reflect that it is the responsibility of the utilities company to provide necessary water supply and wastewater infrastructure to support development. Their investment programmes are not necessarily integrated with Local Plans, and often will not address the development requirements for an area until specific proposals become committed, normally through the grant of planning permission.</p>	Support noted.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO1030	Mark Rose (Define Planning & Design) on behalf of Bloor Homes (Max Whitehead)	Policy OHF1: Housing Provision	<p>Flexibility - A flexible contingency of 20% (as per the Local Plan Advisory Group's recommendation) should be applied to the overall housing land supply to ensure that the LHN is recognised and treated as a minimum rather than a maximum figure. In this light, the LDLPR should plan for the delivery of 14,160 dwellings by allocating additional development sites, which would include the Areas of Development Restraint (ADR) that are proposed to be safeguarded for future development, and other suitable sites such as to the east of Shenstone, which would fully realise the proposed spatial strategy.</p> <p>Realistic Delivery Assumptions - note the considerable dependence on the delivery of housing to the north-east of Lichfield in the spatial strategy. Strategic Policy OHF1 sets out to delivery approximately 3,300 dwellings within this single location; which represents 28% of the overall housing requirement of the District in the period to 2040 which will be complicated to deliver. LPR must take a realistic view of the timescale of the sites delivery. LDC must include a trajectory illustrating expected rate of housing delivery over the plan. If anticipated delivery will not meet the housing requirement then the document will need to allocate additional development sites.</p> <p>Existing commitments - it should not be presumed that previously allocated sites should be allocated again. No evidence of the audit undertaken to confirm that the sites allocated that have not yet come forward are still 'deliverable' and 'developable'. LDC must ensure a continual supply of housing from a substantial and wide portfolio and also a 5 year supply of deliverable housing land supply at the point of LDCs adoption and a rolling supply thereafter.</p> <p>Welcomes the proposed delivery of 800 dwellings within a strategic development at Land West of Fazeley. The delivery of development in this location reflects the housing needs of the District, the geography of the unmet housing need arising within the wider HMA and the stated objectives of the emerging LPR and the site's allocation, therefore, represents an important element of the LPR's portfolio of housing development sites.</p>	Comments noted. There is no statutory planning requirement to include a 'buffer' on top of the housing requirement. The preferred options document does state that a buffer to ensure flexibility in supply will be applied. Further evidence in terms of housing supply will be prepared and inform the local plan review.
LPRPO1031	Mark Rose (Define Planning & Design) on behalf of Bloor Homes (Max Whitehead)	Policy OHF2: Providing a Balanced Housing Market and Optimising Housing Density	<p>Support Strategic Policy OHF2 in principle but policy should allow a degree of flexibility to take into account the site and context characteristics as well as market demand in locality to ensure the housing mix is justified.</p> <p>Inappropriate therefore to include a preferred mix table within policy as it does reflect the issues that indicate that a site specific approach would be more effective when considering a balanced housing provision. This is reflected in Policy OHF2 which states that types, tenures and sizes of houses delivered should 'reflect and respond to latest housing needs and demands of the district'; a sentiment that is supported.</p> <p>Essential that the difference between need and demand is recognised in the Local Plan, for example the need for smaller households might be for smaller properties, the actual demand is commonly still for larger properties.</p> <p>Contends that the preferred housing mix table should be removed from Policy OHF2.</p>	Comments noted. Policy seeks to provide a balanced housing market within the district and provide a mix of dwellings to meet evidenced need.
LPRPO1032	Mark Rose (Define Planning & Design) on behalf of Bloor Homes (Max Whitehead)	Policy OEE1: Our employment and economic development	<p>Supports LDCs intention to maintain and seek to diversify its local economy by allocating 61ha of land for employment. Tamworth Borough Council identified 14ha of employment land will be required outside of the Borough and it is agreed this provision will be delivered through co-operation between LDC and North Warwickshire Borough Council.</p> <p>Settlements such as Mile Oak are suitably located to accommodate additional employment provision that meets the needs of LDC whilst contributing to TBCs unmet employment need. There is potential provision of a small employment offer within the development of Land West of Fazeley.</p>	Comments noted.
LPRPO1033	Mark Rose (Define Planning & Design) on behalf of Bloor Homes (Max Whitehead)	Policy OHF4: Affordable housing	<p>Fully supports the provision of affordable housing an integral part of housing development to meet the areas affordable housing needs. Policy seems to indicate that the maximum level of provision will be sought on a site by site basis, presumably based on a viability appraisal undertaken at the application stage. However, this approach is contrary to the NPPF.</p> <p>Policy OHF4 must seek to set a fully justified and clear affordable housing requirement (both the quantum and mix). That will provide the land owners and developers with the certainty they required to ensure the delivery of the sustainable development of the proposed allocation sites needed to address the identified market and affordable LHN.</p>	Comments noted. The council continues to gather evidence in support of the local plan. Further viability evidence will be gathered to inform the further stages of the local plan.
LPRPO1034	Mark Rose (Define Planning & Design) on behalf of Bloor Homes (Max Whitehead)	Policy ONR1: Green Belt	Supports proposed amendments to Green Belt in order to release sites for residential development to address local housing need. However, further strategic releases are required particularly at Shenstone if the identified housing needs are to be fully met within the plan period and the strategic objectives realised.	Comments noted.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO1035	Mark Rose (Define Planning & Design) on behalf of Bloor Homes (Max Whitehead)	Policy SHA1: Strategic housing north of Lichfield	<p>Housing delivery strategy largely relies on the timely delivery of 3,300 homes at the strategic housing allocation north of Lichfield. Reliance on such a significant strategic allocation is particularly risky in relation to meeting the LHN within the plan period and maintaining a five year supply of housing as, by their very nature, large sites are complicated to deliver and can often be subject to delays and reduced delivery rates. LDC must include a trajectory illustrating the expected rate of housing delivery over the plan period in this key development based on a reasonable assessment of lead in times and delivery rates.</p> <p>For sites of 2,000+ dwellings research shows, the average Total Development Timescale (from the submission of the first planning permission to the delivery of the first dwelling on site) is 8.5 years. Using that assumption and that a planning application would immediately follow the adoption of the document, delivery on site would likely begin in 2030/31 which would afford 9/10 years of delivery within the remaining plan period, meaning the site would be extremely unlikely to build out to its full capacity by the end of the plan period leading to unmet housing need in the District which should be addressed by allocation additional sites.</p>	Comments noted.
LPRPO1036	Mark Rose (Define Planning & Design) on behalf of Bloor Homes (Max Whitehead)	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>Supports the proposed allocation of Land West of Fazeley for residential development. Proposed site would deliver approx. 800 dwellings at 37dph. Provide a range of house types, sizes and tenures and affordable housing. Deliver key facilities including a primary school, sports pitches and play areas. Would deliver improvements to local highway network. Provision of a small employment offer within the site.</p> <p>Urban form and strategic road infrastructure and established landscape structure would mitigate impact on encroachment into the countryside and Green Belt. Residential development would have limited impact on landscape character which can be further mitigated through the landscape scheme design. Any impact on heritage assets will also be mitigated. No ecological constraints to the allocation of the site for development. Minor flood risk can be mitigated.</p> <p>A Highways and Transport Strategy has been undertaken and examines the scope for enhancing the signal-controlled junction of Hints Road/ Sutton Road. A scheme has been designed and assessed that provides some benefit. An alternative mitigation scheme has also been identified comprised of a gyratory arrangement with movements at the existing signal-controls rationalised to reduce the number of conflicting movements therefore providing improved levels of operation has also been identified. Has potential to offer a significant improvement in terms of operation with substantial reduction in queue lengths from all arms at the junction when compared to current arrangements.</p>	Comments noted
LPRPO1037	Laraine & Andrew Jones	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>As a long-term resident, I object to the addition of 800 houses in the Mile Oak area on the grounds that current congestion has not been addressed. Therefore, additional vehicles in the area as a result of the proposed development and the HS2 construction site which is within half a mile from Gainsborough Drive would certainly cause even more congestion.</p> <p>All this will undoubtedly impact negatively on air quality and contradicts the "No negative impact on air quality" promise made to residents. Furthermore local services will not be able to cope with the additional pressure.</p>	Comments noted. Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO1038	F. Lee-McQueen (Turley) for Vistry Homes	Section 7: Our vision	<p>Support. Should acknowledge the role Tamworth plays as one of the largest towns in Staffordshire in providing sustainable areas of growth within Lichfield District. Suggest make stronger with greater emphasis placed on the 'need' and/or 'will' to deliver growth rather than an "aspiration" to. The contribution of 4,500 dwellings towards the GBHMA should be specified within the Vision as this shortfall should be considered at the very early stage when directing growth, particularly as some of the shortfall arises from neighbouring Tamworth.</p>	Comments noted. Preferred Options document is clear in respect of the contribution towards unmet housing needs from within the HMA.
LPRPO1039	F. Lee-McQueen (Turley) for Vistry Homes	Chapter 8: Our strategic objectives & priorities	<p>Broadly align. Should make reference to housing needs from GBHMA, especially as some of these needs arise in Tamworth.</p>	Comments noted. Preferred Options document is clear in respect of the contribution towards unmet housing needs from within the HMA.
LPRPO1040	F. Lee-McQueen (Turley) for Vistry Homes	Policy OHF1: Housing Provision	<p>The total housing allocations fall 232 homes short of the 'minimum' housing requirement of 11,800. Policy covers an excessive amount of housing policy and is not sufficiently focussed. Need to provide a distinction between District needs and HMA contribution as the actual shortfall to 2040 is still to be confirmed. No need to duplicate strategic sites. Need to identify further strategic sites to meet the minimum housing requirement, as well as identifying a suitable buffer to build in flexibility throughout the plan period. There is clear evidence of a greater local need for housing in Lichfield beyond the minimum figure generated by the standard method as no evidence to suggest that local needs have fallen, adherence to the minimum figures generated through the standard method would undermine recovery and more than halve the current build rate. Should be at least 600 dwellings per annum, which would equate to a requirement of at least 13,200 dwellings over the plan period. Support 20-25% supply buffer and no mention of supply buffer, Table 3.1 actually provides a level of provision which is less than the minimum housing requirement- 11,568 dwellings. Contend that the plan should be seeking to deliver at least 600 dwellings per annum, which will require further strategic allocations, including the land south of Highfields Road, Burntwood.</p>	Comments noted. Considered that the Preferred Options document identifies sufficient supply to meet housing requirement.
LPRPO1041	F. Lee-McQueen (Turley) for Vistry Homes	Policy OSS2:Our Spatial Strategy	<p>Do not support the spatial strategy as has removed reference to 'Neighbouring Towns and settlements. Land to the north of Tamworth would now be included with Level 5 'Smaller Rural Villages and Our Wider Rural Areas' within the settlement hierarchy. Such an approach is not justified and completely disregards the findings of the strategic growth study and should be maintained. North of Tamworth scores more favourably than LPR proposed allocations.</p>	Comments noted. Settlement hierarchy is based upon evidence which identifies the hierarchy of settlements within Lichfield District.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO1042	F. Lee-McQueen (Turley) for Vistry Homes	Chapter 13: Our homes for the future	OHF2: Welcome the final mix subject to further negotiation during the planning application stage. This is justified in that demography and market signals will change over the plan period. Agree that development must make the most efficient use of land and be developed at the optimum density 35 dwellings per ha as a minimum standard appropriately allows for flexibility and will enable development proposals to respond sensitively to the surrounding context and character of built-up environments.	Comments noted. Housing mix is based upon evidence which supports the local plan review. Mix seeks to provide appropriate homes to meet local need.
LPRPO1043	F. Lee-McQueen (Turley) for Vistry Homes	Policy OHF4: Affordable Housing	Further viability testing to identify the appropriate rate for affordable housing provision. Object that policy in relation to off site and contributions in-lieu is not in accordance with the NPPF.	Comments noted. The council continues to gather evidence in support of the local plan. Further viability evidence will be gathered to inform the further stages of the local plan.
LPRPO1044	F. Lee-McQueen (Turley) for Vistry Homes	Policy SHA2: Strategic housing allocation land west of Fazeley	Object -Sustainability and accessibility, Landscape and visual impact, Inadequate Green Belt review of site. There are much more suitable and sustainable locations for growth in Lichfield District, in particular land to the north of Tamworth (where Vistry Homes controls land to the north of Gillway lane) which is outside of the Green Belt and in closer proximity to the services and facilities in Tamworth town centre. No infrastructure capacity study has been prepared. Do not agree that the existing environment in Fazeley justifies the proposed allocation. No evidence has been published to demonstrate that 800 dwellings will provide a sufficient critical mass to viably deliver a new school, neighbourhood centre and other infrastructure. Site could not be released for development without significant effects on landscape and visual amenity. Failed to appropriately consider the individual contribution which land to the west of Fazeley makes to the Green Belt.	Comments noted. Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy. Further evidence will be collected which will inform the local plan review.
LPRPO1045	F. Lee-McQueen (Turley) for Vistry Homes	Whole document	In meeting its own needs and those of the wider Housing Market Area, it will be necessary for Lichfield's most sustainable locations to accommodate significant growth. This includes land to the north of Tamworth, which has been recognised by the Greater Birmingham Housing Market Area Strategic Growth Study as a sustainable location for growth given its proximity to Tamworth town centre. Vistry Homes' site is well suited to meeting this need to the north of Tamworth and can deliver significant benefits for existing and new residents.	Comments noted. Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO1046	Mavesyn Ridware Parish Council	Whole document	It is essential for our Parish to continue to work towards formation of our Neighbourhood Plan so that District is able to use it in their planning considerations for our parish. There is an emerging emphasis from central government and through district and included within the review, for more consideration for climate change mitigation, preservation of the natural environment, energy use, sustainable rural communities, access to more and better rural public transport and employment opportunities so that this is now a perfect opportunity for us to bring about a vision for our parish in partnership with district. Further to this we do hope that the discussion to be had in future years and considered for the district post 2040 (ref: section 9 'Spatial Strategy') with regard to the possible creation of a new settlement, does not focus on our area ? It does seem that the search for a site close to the A5/A38 corridor seems the most likely outcome however.	Comments noted. The Preferred Options document does not identify the location for a new settlement.
			<p>[LDC NOTE - The following response has been prepared by the Burntwood Action Group. Additionally the action group has prepared a representation which has been circulated and has been submitted by 684 individual stakeholders]</p> <p>Representation is made on behalf of the 351 members of Burntwood Action Group (BAG). BAG welcome the significant change in the draft revision of the Local Plan to focus growth on "our villages" and a new settlement instead of Lichfield and Burntwood. LDC has fulfilled commitment in existing local plan to build Burntwood's new homes in Burntwood's most sustainable places on Brownfield sites close to the town centre, but little effort has been made to improve Burntwood's infrastructure and residents are now suffering from the increased demands on Burntwood's infrastructure. BAG has little faith in LDC to provide improvements to infrastructure required for new homes.</p> <p>First sentence of paragraph 1.3 does not make sense. Should it read: "towards meeting the needs/demands of the Birmingham and Black Country Housing Market Area". We have not seen any documentation indicating a request from the GBHMA for LDC to accommodate these 4500 homes and there a strong voices, including the West Midlands Mayor' which suggest there is sufficient previously used land to house all the homes. BAG believes that LDC's decision to take these 4500 homes is driven by the need to raise revenue to compensate for that which has been lost from Central Government and we are concerned that LDC is prepared to sacrifice some of our Green belt for this purpose. If in its Green Belt Reviews LDC had classified all Green Belt as important role in assisting urban regeneration it might have encouraged officers within the GBHMA to work harder to find and release brownfield sites.</p> <p>Page 8: Our supporting evidence base</p> <p>The Green Belt Review is a vital element of the evidence base and members of BAG are appalled that despite consultation on the method statement in June 2019 LDC did not make the results of the consultation available or make respondents aware of publication of the Green Belt Review in September 2019. We had been expecting the final review to be subject to public consultation. Consider the review is as prejudiced as all others since 2013. In the appendix to this representation we analyse elements of the 2013 and 2019 Green Belt Reviews which pertain to Burntwood.</p>	Comments noted. The adopted Local Plan Strategy and Allocations document commit the Council to an early review of the Local Plan, partly advance in light of the unmet housing need within the HMA. Evidence has been prepared by the authorities within the HMA which details the level of unmet need to be planned for.

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LPRPO1047	Burntwood Action Group (BAG)	Whole document	Sustainability appraisal 2019 is a crucial pieces of evidence and whilst we recognise that there will be many assumptions, uncertainties and difficulties we assert there is a need for clarity and unambiguity in such documents. The assumption here appears to be that all land "adjacent to existing settlements" is brownfield land and that development of it would result in a positive effect on the environment. This is very far from reality where all of the land adjacent to Burntwood is greenfield land and housing development on it would result in a very serious negative effect on Burntwood's environment.	the authorities within the HMA which details the level of unmet need to be planned for. The Green Belt Review method statement was consulted upon and made clear that no further stages of consultation specifically on the Green Belt Review would take place. The 2019 document was published alongside the Preferred Options document and has been available during that consultation period. Additionally the published Green Belt Review includes an Annex which sets out all consultation responses received to the method statement and the response to these.
LPRPO1048	Mr Jeremiah	Policy ONR1: Green Belt	Resident opposes 1300 homes being built in the land at Burntwood proposed to be released from the Green Belt by Hospital Road. Concerned about traffic on small roads and protecting the Green Belt.	Comments noted. The Preferred Options document does not propose the development being referred to. The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO1049	CPRE	Policy ONR1: Green Belt	Question the justification for the removal of land from the Green Belt for new development.	Comments noted. Preferred options document includes proposals which relate to changes to Green Belt boundaries. NPPF makes clear that changes to Green Belt boundaries can only be made where exceptional circumstances exist to justify such changes.
LPRPO1050	CPRE	Policy OSS2:Our Spatial Strategy	Concerns relating to the increased scale of housing development envisaged in the document; particularly the level of additional development to serve the Greater Birmingham area. regret that the differing local need and Greater Birmingham housing requirements have not been considered separately in terms of the justification for the new strategic development allocations/areas – for example how the allocation at Fradley would be considered to be satisfactory to serve the needs of the Greater Birmingham area despite the distance and lack of public transport. We think an approach similar to that used by South Staffordshire - which considers how better to meet specific requirements in more detail is preferable.	Comments noted. Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO1051	CPRE	Chapter 14: Our economic growth, enterprise & tourism	We have issues relating both to the scale of additional employment provision and the absence of any new indicative allocations/locations (unlike what has been done for housing).	Comments noted. Employment allocations will be established through the further stages of the local plan review.
LPRPO1052	David Coton	Policy ONR1: Green Belt	Objects to taking the land along Hospital Road and Norton Lane out of the Green Belt. Concerned about the wildlife nearby, traffic increase and on the wellbeing of the residents.	Comments noted. The Preferred Options document does not propose the development being referred to. The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO1053	P Harris (Cerde) for Leaf Property Group	Policy OSS2:Our Spatial Strategy	Does not explicitly acknowledge that the contribution Lichfield will be making to the GBBCHMA shortfall is based on the latest evidence, it is reasonable to assume that given the publication (November 2019) of the PO predates the publication of the latest Black Country Urban capacity review, the contribution which Lichfield district makes to the shortfall should grow proportionately to some 5,175 homes. Consider more appropriate to allocate a level of growth within the parts of Lichfield district which are closest to those conurbation. Surprising that no allocations are made for Burntwood.	Comments noted. Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review. The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period.
LPRPO1054	P Harris (Cerde) for Leaf Property Group	Policy OHF1: Housing Provision	Table 13.1 incorrectly drafted. Total, at 11,618 homes is almost 200 homes short of the council's stated minimum need of 11,800. It is unclear how the remainder are to be delivered. Too great a gap to be made up by windfall development. Great concern that leaving the delivery of at least 850 homes to the Neighbourhood Plan (NP) process. Could be resolved by allocations in a further Allocations Document, this creates further uncertainty and raises question marks over delivery timescales. needs redrafting to ensure that the delivery of the homes presently identified for allocation through the NP process is done instead through the Local Plan review. The quantum of allocations should be much closer to the identified minimum need having full regard to the requirement to increase the contribution towards the GBBCHMA overspill. assert that the distribution of homes as set out within both Policies OHF1 and OSS2 should be revised to reduce the is proportionate reliance on Lichfield to accommodate the bulk of the District's housing need, increase the quantum for Burntwood and furthermore, make it clear that allocations will be identified through the Local Plan Review (not NPs) in the Level 1, 2 and 3 settlements including Burntwood. Should allocate clients site SHLAA 284, Land north of Chorley Road, Burntwood.	Comments noted. The preferred options document identifies sufficient housing supply to meet requirements.
LPRPO1055	P Harris (Cerde) for Leaf Property Group	Whole document	Green Belt Review: Assessment of parcel B5 is an assessment of the wider parcel as a whole is not necessarily representative of the site to which these representations relate. Assessment provided - our assertion that the overall score for the site should be minor. Housing Site Selection paper - scoring contended, site should not be discounted.	Comments noted. The Green Belt Review provides a comprehensive strategic assessment of all parts of the green belt.
LPRPO1056	R Cooke (Marrons) for Bellway	Policy OSS2:Our Spatial Strategy	Spatial Strategy should be updated to include the opportunity promoted by Bellway Homes at Coton Lane to provide further residential development at the northern edge of Tamworth. Tamworth is clearly a sustainable settlement Further residential development north of Tamworth would be consistent with the adopted spatial strategy, land is not Green Belt and allocating it for residential development would reduce the need to release land from the Green Belt elsewhere to accommodate the growth requirements of the District utilise existing infrastructure and services. There is an opportunity to deliver benefits locally, including improved linkages between the Rawlett School to the east of the site and the new residential development to the west, and to accommodate additional parking and drop off areas near to the school.	Comments noted. Site promotion noted.
LPRPO1057	R Cooke (Marrons) for Bellway	Policy NS1: New Settlement	Does not object to the proposed new settlement concept but considers that the draft Spatial Strategy should be updated to include the opportunity promoted by Bellway Homes at Coton Lane.	Comments noted. Site promotion noted.

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LPRPO1058	John Turnbull	Policy ONR1: Green Belt	Concerned that the number of green belt reviews are being used to suit the purposes of development and enables LDC to wipe away the overwhelming objections they have received. Criticises Arup's 'bloated' 500 page Green Belt review is being used to build the case for minimising the green belt. He hopes a standard methodology is formulated to prevent abuse.	Comments noted. Proposals relating to the Green belt are based upon a range of evidence and planning judgement including the Green Belt Review. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.
LPRPO1059	R Cooke (Marrons) for Bellway	Chapter 12: Our sustainable transport	OST2: considers that the draft Spatial Strategy should be updated to include the opportunity promoted by Bellway Homes at Coton Lane can be developed in a manner that is compatible with the local highway network.	Comments noted. Site promotion noted.
LPRPO1060	R Cooke (Marrons) for Bellway	Policy OSC1: Securing sustainable development	Consider clients site at Coton Lane can contribute towards sustainable development and can demonstrate compliance with the draft policy.	Comments noted. Site promotion noted.
LPRPO1061	R Cooke (Marrons) for Bellway	Policy OHF1: Housing Provision	Spatial Strategy should be updated to include the opportunity promoted by Bellway Homes at Coton Lane. Would be consistent with the adopted spatial strategy, and locate new housing in an area well placed to meet unmet needs arising from adjoining authorities update OHF1 accordingly.	Comments noted. Site promotion noted.
LPRPO1062	R Cooke (Marrons) for Bellway	Policy ONR1: Green Belt	Spatial Strategy should be updated to include the opportunity promoted by Bellway Homes at Coton Lane which is not part of the West Midlands Green Belt and so allocating it for residential development would reduce the need to release Green Belt land in the district. Site would make a positive contribution towards sustainable development as an extension to a well-established and sustainable urban area.	Comments noted. Site promotion noted.
LPRPO1063	R Cooke (Marrons) for Bellway	Policy OR1: Smaller Rural villages and our wider rural areas	Spatial Strategy should be updated to include the opportunity promoted by Bellway Homes at Coton Lane the site is not included in the settlement hierarchy and so would be located in the wider rural area in planning terms policy should be updated to include a reference to land at North Tamworth being suitable for residential development.	Comments noted. Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO1064	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Chapter 7: Our vision	Overall, the Local Plan Review document would benefit from clearer referencing throughout in order to clearly demonstrate how the spatial strategy relates back to the Vision, Strategic Objectives and Priorities, as well as to its evidence base. At present there is a lack of detail in the Plan which is needed to demonstrate the viability and deliverability of the strategy and robust evidence will need to be produced to enable meaningful engagement to ensure a sound plan. The 'Policies Map' should currently be referred to as a 'Proposals Map' until the Plan is adopted.	Comments noted. Submission document will include references and links to evidence base documents and links to strategic objectives.
LPRPO1065	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy OSS2:Our Spatial Strategy	The settlement hierarchy should recognise west of Tamworth as a sustainable location for growth within Lichfield District. Tamworth is a large market town which benefits from a number of services and facilities. Overall settlement hierarchy is generally supported. The spatial strategy should identify the strategic levels of growth for both housing and economic growth across the District in line with the settlement hierarchy	Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO1066	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy OSC1: Securing sustainable development	The approach to sustainable development set out in Policy OSC1 is generally supported where it is consistent with national policy. However, certain aspects of the policy as currently drafted should be refined. In particular, the policy wording in relation to air quality is currently unclear. Policies OSC4 and OSC5 are generally supported, but need to be amended to be in accordance with national guidance.	Comments noted. Policy wording to be considered in light of evidence supporting the local plan.
LPRPO1067	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy INF1: Delivering our Infrastructure	Policy INF1 is aimed to providing the infrastructure required by the District's communities and businesses and safeguarding existing infrastructure. This is supported; however, it is considered there needs to be additional evidence published in support of the Local Plan Review regarding infrastructure in order to provide clarity over what additional infrastructure is required to support the allocations within the Local Plan Review and how these will be delivered. Without such evidence, the viability and deliverability of such allocations is questionable	Comments noted. Further evidence in relation to infrastructure will support the local plan review process.
LPRPO1068	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Chapter 12: Our Sustainable Transport	The approach to sustainable transport set out in the policies in this section is broadly supported. However, the requirement for all major development proposals to produce a travel plan is too onerous for smaller developments as it would apply to all development of 10 or more dwellings. This threshold should be revised to a higher level. It is noted that parking provision will continue to be determined with reference to the Sustainable Development Supplementary Planning Document (SPD). This is not in line with national policy and should be reviewed. It is noted that the policy provides greater flexibility for the provision of parking to be considered for specific development proposals and this is supported.	Comments noted. Supplementary Planning Documents supported the adopted local plan. Revision to or new SPD's will be considered in due course following the local plan review.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO1069	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy OHF1: Housing Provision	There are four strategic development allocations/areas listed in Policy OHF1 alongside the approximate number of new homes they will deliver. These allocations reflect the new allocations for growth set out in Strategic Policy OSS2. However, it is not clear how the proposed allocations relate to the spatial strategy or settlement hierarchy. Additionally, there is no reasoning which sets out the inconsistency with the current adopted spatial strategy. The proposed levels of growth vary significantly between settlements, including between those at the same level in the settlement hierarchy. It is not clear how the spatial strategy has led to this and this needs to be demonstrated and justified, along with further details (and requirements and potential allocations) relating to those settlements which have been omitted., the current strategy is heavily reliant on a single large site to deliver the overall housing requirement (land north-east of Lichfield) However, this is not supported by detailed evidence to show that work has progressed sufficiently to demonstrate deliverability of this during the plan period. Concern has already been raised within this representation concerning the infrastructure requirements and deliverability issues in relation to the provision of a new settlement. These concerns are equally applicable to the allocation of 3,300 new dwellings in a single location north-east of Lichfield. Further commentary on this allocation is provided later in this Representation, in respect of Policy SHA1.	Comments noted. A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO1070	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy OHF2: Providing a balanced housing market and optimising housing density	Richborough Estates is concerned that, in its current form, this policy lacks sufficient flexibility to meet changing housing needs across the District and across the plan period, by referring to specific percentage figures. In seeking to specify a mix, the policy lacks flexibility to reflect differences across the District's sub-market areas; changing needs over the plan period and site-specific considerations which will often influence the mix that can be delivered on individual sites. Furthermore, this plan proposes 4,500 additional homes to meet the needs of the GBBCHMA. The housing needs of neighbouring authorities will accordingly also be crucial consideration in determining housing mix on developments meeting cross boundary requirements. Policy OHF2 should contain flexibility to reflect this. The policy also sets out minimum net density of 35 dwellings per hectare. This is considered to be broadly appropriate. Developments in Lichfield City, Burntwood Town and locations with good public transport links will be expected to achieve higher densities of approximately 50 dwellings per hectare. It is questioned if this is actually achievable, or indeed appropriate on many sites in Lichfield and Burntwood, particularly those outside of the centres where regard should also be had to context and setting. It is suggested that an amendment to the policy to focus this higher level of density upon centres, with more flexibility to the wider urban areas (see NPPF paragraph 123 a) would be a more sensible approach.	Comments noted. Evidence within the HEDNA suggests the Council will be justified in seeking to achieve as much affordable housing as viably possible on appropriate development sites. Further viability evidence is being collected which will inform the policy and provide a clear position in terms of the appropriate level of affordable housing to be sought.
LPRPO1071	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy OHF4: Affordable Housing	The lack of a specific affordable housing threshold in the policy does not accord with either the NPPF or the Viability and Plan Making section within PPG. National policy clearly requires a Local Plan to set an affordable housing percentage which this policy currently lacks. The policy also seeks to allow flexibility in the tenure, size and type of affordable housing on a scheme by scheme basis. This flexibility is supported and should be delivered with reference to the most up-to-date Strategic Housing Market Assessment (SHMA).	Comments noted. Evidence within the HEDNA suggests the Council will be justified in seeking to achieve as much affordable housing as viably possible on appropriate development sites. Further viability evidence is being collected which will inform the policy and provide a clear position in terms of the appropriate level of affordable housing to be sought.
LPRPO1072	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy OEE1: Our employment and economic development	This policy states that approximately 61 hectares of land will be allocated for employment use in accordance with the Housing and Economic Development Needs Assessment 2019. It is not clear why the current consultation document has not identified any employment sites and it should be clarified how the Council intends to deliver its employment land needs. Land South of Bonehill Road is a site that can assist in meeting this identified need. Overall the Council's aspirations for economic growth are welcomed by Richborough Estates as part of a balanced sustainable strategy.	Comments noted. Employment allocations will be established through the further stages of the local plan review.
LPRPO1073	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy OSHC1: Healthy and safe communities	The approach to healthy and safe communities in Policy OSHC1 is generally supported. However, the policy states that health and education infrastructure requirements related to strategic development proposals will need to be understood and determined through the Local Plan and accompanying evidence base. Further work is needed on the evidence base and in relation to viability testing regarding infrastructure.	Comments noted. he council continues to gather evidence in support of the local plan. Further viability evidence will be gathered to inform the further stages of the local plan.
LPRPO1074	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy ONR1: Green Belt	As currently drafted, the policy covers both strategic and development management matters related to Green Belt. It is suggested it would be clearer to separate strategic and development management concerns into separate policies. Furthermore, reference is made to national Green Belt policy. However, the policy wording itself then does not reflect national policy. This should be rectified. In terms of the strategic approach to the Green Belt there is an acceptance that there needs to be changes to the Green Belt boundary to accommodate growth requirements at Whittington and Fazeley. Green Belt release needs to be made to deliver a sustainable spatial strategy. The plan also designates three ADRs to be removed from the Green Belt to ensure that the Green Belt boundary is capable of enduring beyond the plan period. The identification of ADR land is supported, however, it is not clear why only three ADRs have been identified and it is questioned whether this will be sufficient to ensure Green Belt boundaries endure beyond 2040, as per the requirements of the NPPF. Policy ONR1 goes on to propose new Green Belt land to define the northern extent of Lichfield city and prevent the coalescence of Lichfield and Fradley. For the proposed new Green Belt between Lichfield city and Fradley it needs to be clearly demonstrated that this meets the relevant tests within the NPPF	Comments noted. The document identifies areas of 'Safeguarded Land' as defined within national policy. National policy states that consideration should be given that where changes to the Green Belt boundary are being proposed then areas of land between the urban area and the Green Belt (Safeguarded Land) should be identified to ensure the Green Belt boundary is capable of enduring beyond the plan period. The preferred options document identifies areas of such safeguarded land in conformity with national planning policy.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO1075	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy ONR2: Habitats and Biodiversity	<p>The approach to habitats and biodiversity set out within Policy ONR2 is generally supported where it is consistent with national policy.</p> <p>Policy ONR5 addresses natural and historic landscape. In Lichfield District, there is a single area of landscape which is nationally valued; Cannock Chase Area of Outstanding Natural Beauty (AONB). It is therefore not clear why this policy makes reference to the Green Belt and should instead focus on the AONB and its immediate surroundings. Any policy text regarding beneficial use of the Green Belt should logically be included in the Green Belt policy (ONR1).</p>	Comments noted.
LPRPO1076	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy SHA1: Strategic housing allocation North of Lichfield	<p>Strategic Housing Allocation SHA1, located to the north-east of Lichfield, forms the principal housing allocation within the emerging Local Plan. The allocation proposes 3,300 new dwellings on land between two existing housing allocations allocated through the adopted Local Plan; Land North East of Watery Lane and Land at Streethay. Whilst development has started on the Streethay SDA, it has not commenced on the Watery Lane site. Given that the outline consent for the Watery Lane site was granted in February 2017 and Reserved Matters approval for the spine road and green infrastructure was only granted in August 2019, the Council will need to be satisfied that there are no underlying issues preventing delivery of this new wider allocation.</p> <p>There is a lack of evidence either in the Local Plan Review or in the supporting evidence base that the local infrastructure can be viably upgraded to accommodate a development of the scale proposed. Significant work is needed to demonstrate that the local (and strategic – A38) highway network along with other infrastructure such as schools and healthcare could be upgraded to support this level of growth. There will need to be significant input from the County Council, Highways England and other statutory stakeholders to ensure relevant modelling is undertaken to test the allocation and identify if the required infrastructure can be viably delivered. The absence of such evidence highlights questions over the deliverability of the proposed allocation.</p> <p>It is suggested that the Lichfield requirement should be distributed across various sites and settlements rather than concentrated on a single large allocation. This approach would provide greater flexibility and resilience in the delivery of the proposed spatial strategy.</p> <p>Such an appropriate alternative site is Land at Lichfield Road, Kings Bromley</p>	Comments noted. Policy SHA1 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO1077	Severn Trent Water PLC	Chapter 8: Our strategic objectives & priorities	Recognise the effort and focus given to the environment tied into several of the strategic objects and priorities, suggests a strong commitment for enhancing green open space and providing/protecting quality, diverse and sustainable land uses within the built environment. Recognise this approach can be an effective mitigation against adverse weather and climate change by providing benefits covering; flood alleviation, water quality, urban cooling, groundwater recharge, air quality as well as biodiversity and amenity value. Interested in partnership opportunities for retro fitting, Lichfield City and Burntwood town.	Comments noted. Open Space policies form part of the preferred options document.
LPRPO1078	Severn Trent Water PLC	Policy OSS2:Our Spatial Strategy	Support safeguard land for required infrastructure. Strongly support commitment to maintaining, enhancing, connecting and expanding green infrastructure by utilising new development to facilitate it. Happy to collaborate on site specific policies following outcome of evidence.	Comments noted. District Council will continue to engage with, and worth with partners, including infrastructure providers.
LPRPO1079	Severn Trent Water PLC	Policy OSC1: Securing sustainable development	<p>Happy to collaborate on site specific policies following outcome of evidence. Suggest also reference the drainage hierarchy as detailed within NPPG;</p> <ol style="list-style-type: none"> 1. into the ground (infiltration) 2. to a surface water body 3. to a surface water sewer, highway drain, or another drainage system 4. to a combined sewer. and use of Grampian style condition to avoid surface water connections to the combined sewer. 	Comments noted. District Council will continue to engage with, and worth with partners, including infrastructure providers.
LPRPO1080	Severn Trent Water PLC	Chapter 10: Our sustainable communities	OSC5: supportive of the request for new developments to provide multifunction benefits including water quality, water quantity, biodiversity and amenity by utilising SUDS effectively. We feel the policy may be improved by explicitly referencing the drainage hierarchy in the NPPF. The aspiration for new development to seek and provide a wider benefit for the character area is a positive approach and utilising sites to strategically tackle cumulative flood risk is something we are favourable of. This approach can also be an effective way to mitigate future sewer incapacity risks posed by new development	Comments noted. Not considered necessary to repeat policy wording as set out within the NPPF within this policy.
LPRPO1081	Severn Trent Water PLC	Policy OHF1: Housing Provision	Support use of brownfield sites as much as possible as uses existing infrastructure. Settlement hierarchy and spatial distribution is relatively clustered which is preferable as it involves fewer locations for capital works. Sustainable surface water disposal is particularly important in Armitage with Handsacre. Other sites assessed in the Water Cycle Study may require sewer capacity upgrades, following site selection we are happy to discuss bespoke planning policies, master plans or phasing strategies.	Comments noted.
LPRPO1082	Severn Trent Water PLC	Policy SHA1: Strategic housing allocation North of Lichfield	<p>Housing delivery strategy largely relies on the timely delivery of 3,300 homes at the strategic housing allocation north of Lichfield. Reliance on such a significant strategic allocation is particularly risky in relation to meeting the LHN within the plan period and maintaining a five year supply of housing as, by their very nature, large sites are complicated to deliver and can often be subject to delays and reduced delivery rates. LDC must include a trajectory illustrating the expected rate of housing delivery over the plan period in this key development based on a reasonable assessment of lead in times and delivery rates.</p> <p>For sites of 2,000+ dwellings research shows, the average Total Development Timescale (from the submission of the first planning permission to the delivery of the first dwelling on site) is 8.5 years. Using that assumption and that a planning application would immediately follow the adoption of the document, delivery on site would likely begin in 2030/31 which would afford 9/10 years of delivery within the remaining plan period, meaning the site would be extremely unlikely to build out to its full capacity by the end of the plan period leading to unmet housing need in the District which should be addressed by allocation additional sites.</p>	Comments noted.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO1083	Severn Trent Water PLC	Policy SHA2: Strategic housing allocation land west of Fazeley	Initial assessment advises that site should be assessed in more detail using hydraulic model once final allocations are determined. Appears to be sustainable surface water disposal options for the site.	Comments noted.
LPRPO1084	Severn Trent Water PLC	Policy SHA3: Strategic housing allocation land north and south of Hay End Lane, Fradley	Initial assessment advises that site should be assessed in more detail using hydraulic model once final allocations are determined. Appears to be sustainable surface water disposal options for the site.	Comments noted.
LPRPO1085	Severn Trent Water PLC	Policy SHA4: Strategic housing allocation land of Huddlesford Lane	Do not currently anticipate any capacity related issues from this proposal. There appears to be sustainable surface water disposal options for this site.	Comments noted.
LPRPO1086	Severn Trent Water PLC	Whole document	Table showing site specific response to non-strategic housing sites. We have an obligation to provide water supplies and sewage treatment capacity for future development. Once detailed plans are available and we have modelled the additional capacity, in areas where sufficient capacity is not currently available and we have sufficient confidence that developments will be built, we will complete necessary improvements to provide the capacity. We will ensure that our assets have no adverse effect on the environment and that we provide appropriate levels of treatment at each of our sewage treatment works. We expect surface water to be managed in line with the Government's Water Strategy, Future Water. The strategy sets out a vision for more effective management of surface water to deal with the dual pressures of climate change and housing development. Surface water needs to be managed sustainably. believe that greater emphasis needs to be paid to consequences of extreme rainfall. In the past, even outside of the flood plain, some properties have been built in natural drainage paths. We request that developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of the sewers. Any proposals should take into account the principles of the WFD and River basin Management Plan for the Severn River basin unit prepared by Environment Agency. Do not anticipate water supply capacity problems in urban areas of the network. Encourage greater water efficiency measures to be adopted and high standard for Building Regulations.	Comments noted.
LPRPO1087	P Fleming	Policy SHA2: Strategic housing allocation land west of Fazeley	Does not feel that the event was promoted enough, suggested flyers being sent through letter box. Only found out through Birmingham Mail Paper. Opposed to development at Fazeley on the basis of traffic congestion and questions how the development will sustain a doctor's surgery as the Doctor in Fazeley has staffing issues.	Comments noted. The approach taken for the consultation was reported to members prior to the beginning of the consultation. The consultation was conducted in accordance with the Council's adopted Statement of Community Involvement (SCI) which sets out how the Council will undertake consultations. Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO1088	B Lune	Policy ONR1: Green Belt	Opposes the removal of land from Burntwood green belt by Hospital Road because it is an area of unofficial natural beauty and due to traffic concerns on Hospital Road. Sees scrub land and brownfield land as a viable alternative.	Comments noted. The Preferred Options document does not propose the development being referred to. The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.
LPRPO1089	Burntwood Action Group (BAG)	Chapter 5: Profile of the District	[LDC NOTE - The following response has been prepared by the Burntwood Action Group. Additionally the action group has prepared a representation which has been circulated and has been submitted by 684 individual stakeholders] LDC fails to accept that Burntwood is an ancient settlement with documented history dating back to the 12th Century. Suggest paragraph 5.32 be rewritten to include detail on the history of the settlement. In respect of the vision there is no evidence within the Local Plan Review to justify the exceptional circumstances which make the release of Green Belt necessary. Our comments are that all Green Belt Reviews from 2013 onward are so prejudiced against certain parcels of land that they would almost certainly fail judicial review. Welcome the building of a new settlement which should allow all of Burntwood valuable Green Belt to be retained. Burntwood has never been provided with the improvements in infrastructure required to serve the increase in housing and population. Through its prejudiced Green Belt Reviews LDC tries to undermine the importance of Green Spaces and corridors which local people consider essential for their own and wildlife's wellbeing. Last eleven words of the vision are not strong enough if LDC is really committed to a policy which halts climate change. It should read 'contributing to the elimination of all actions which contribute to climate change'.	Comments noted. Green Belt Review is part of the evidence which supports the Local Plan. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice. Local plan includes policies relating to climate change. The District Council is preparing further evidence base in relation to climate change. Evidence will inform the local plan review.
LPRPO1090	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Chapter 7: Our vision	Overall, the Local Plan Review document would benefit from clearer referencing throughout in order to clearly demonstrate how the spatial strategy relates back to the Vision, Strategic Objectives and Priorities, as well as to its evidence base. At present there is a lack of detail in the Plan which is needed to demonstrate the viability and deliverability of the strategy and robust evidence will need to be produced to enable meaningful engagement to ensure a sound plan. The 'Policies Map' should currently be referred to as a 'Proposals Map' until the Plan is adopted.	Comments noted. Submission document will include references and links to evidence base documents and links to strategic objectives.
LPRPO1091	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy OSS2: Our spatial strategy	The settlement hierarchy should recognise west of Tamworth as a sustainable location for growth within Lichfield District. Tamworth is a large market town which benefits from a number of services and facilities. Overall settlement hierarchy is generally supported. The spatial strategy should identify the strategic levels of growth for both housing and economic growth across the District in line with the settlement hierarchy	Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO1092	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy OSC1: Securing sustainable development	The approach to sustainable development set out in Policy OSC1 is generally supported where it is consistent with national policy. However, certain aspects of the policy as currently drafted should be refined. In particular, the policy wording in relation to air quality is currently unclear. Policies OSC4 and OSC5 are generally supported, but need to be amended to be in accordance with national guidance.	Comments noted. Policy wording to be considered in light of evidence supporting the local plan.
LPRPO1093	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy INF1: Delivering our Infrastructure	Policy INF1 is aimed to providing the infrastructure required by the District's communities and businesses and safeguarding existing infrastructure. This is supported; however, it is considered there needs to be additional evidence published in support of the Local Plan Review regarding infrastructure in order to provide clarity over what additional infrastructure is required to support the allocations within the Local Plan Review and how these will be delivered. Without such evidence, the viability and deliverability of such allocations is questionable	Comments noted. Further evidence in relation to infrastructure will support the local plan review process.
LPRPO1094	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Chapter 12: Our Sustainable Transport	The approach to sustainable transport set out in the policies in this section is broadly supported. However, the requirement for all major development proposals to produce a travel plan is too onerous for smaller developments as it would apply to all development of 10 or more dwellings. This threshold should be revised to a higher level. It is noted that parking provision will continue to be determined with reference to the Sustainable Development Supplementary Planning Document (SPD). This is not in line with national policy and should be reviewed. It is noted that the policy provides greater flexibility for the provision of parking to be considered for specific development proposals and this is supported.	Comments noted. Supplementary Planning Documents supported the adopted local plan. Revision to or new SPD's will be considered in due course following the local plan review.
LPRPO1095	Neil Cox (Pegasus Group) on behalf of Richborough Estates	OHF1: Housing Provision	There are four strategic development allocations/areas listed in Policy OHF1 alongside the approximate number of new homes they will deliver. These allocations reflect the new allocations for growth set out in Strategic Policy OSS2. However, it is not clear how the proposed allocations relate to the spatial strategy or settlement hierarchy. Additionally, there is no reasoning which sets out the inconsistency with the current adopted spatial strategy. The proposed levels of growth vary significantly between settlements, including between those at the same level in the settlement hierarchy. It is not clear how the spatial strategy has led to this and this needs to be demonstrated and justified, along with further details (and requirements and potential allocations) relating to those settlements which have been omitted., the current strategy is heavily reliant on a single large site to deliver the overall housing requirement (land north-east of Lichfield) However, this is not supported by detailed evidence to show that work has progressed sufficiently to demonstrate deliverability of this during the plan period. Concern has already been raised within this representation concerning the infrastructure requirements and deliverability issues in relation to the provision of a new settlement. These concerns are equally applicable to the allocation of 3,300 new dwellings in a single location north-east of Lichfield. Further commentary on this allocation is provided later in this Representation, in respect of Policy SHA1.	Comments noted. A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO1096	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy OHF2: Providing a balanced housing market and optimising housing density	Richborough Estates is concerned that, in its current form, this policy lacks sufficient flexibility to meet changing housing needs across the District and across the plan period, by referring to specific percentage figures. In seeking to specify a mix, the policy lacks flexibility to reflect differences across the District's sub-market areas; changing needs over the plan period and site-specific considerations which will often influence the mix that can be delivered on individual sites. Furthermore, this plan proposes 4,500 additional homes to meet the needs of the GBBCHMA. The housing needs of neighbouring authorities will accordingly also be crucial consideration in determining housing mix on developments meeting cross boundary requirements. Policy OHF2 should contain flexibility to reflect this. The policy also sets out minimum net density of 35 dwellings per hectare. This is considered to be broadly appropriate. Developments in Lichfield City, Burntwood Town and locations with good public transport links will be expected to achieve higher densities of approximately 50 dwellings per hectare. It is questioned if this is actually achievable, or indeed appropriate on many sites in Lichfield and Burntwood, particularly those outside of the centres where regard should also be had to context and setting. It is suggested that an amendment to the policy to focus this higher level of density upon centres, with more flexibility to the wider urban areas (see NPPF paragraph 123 a) would be a more sensible approach.	Comments noted. Evidence within the HEDNA suggests the Council will be justified in seeking to achieve as much affordable housing as viably possible on appropriate development sites. Further viability evidence is being collected which will inform the policy and provide a clear position in terms of the appropriate level of affordable housing to be sought.
LPRPO1097	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy OHF4: Affordable Housing	The lack of a specific affordable housing threshold in the policy does not accord with either the NPPF or the Viability and Plan Making section within PPG. National policy clearly requires a Local Plan to set an affordable housing percentage which this policy currently lacks. The policy also seeks to allow flexibility in the tenure, size and type of affordable housing on a scheme by scheme basis. This flexibility is supported and should be delivered with reference to the most up-to-date Strategic Housing Market Assessment (SHMA).	Comments noted. Evidence within the HEDNA suggests the Council will be justified in seeking to achieve as much affordable housing as viably possible on appropriate development sites. Further viability evidence is being collected which will inform the policy and provide a clear position in terms of the appropriate level of affordable housing to be sought.
LPRPO1098	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy OEE1: Our employment and economic development	This policy states that approximately 61 hectares of land will be allocated for employment use in accordance with the Housing and Economic Development Needs Assessment 2019. It is not clear why the current consultation document has not identified any employment sites and it should be clarified how the Council intends to deliver its employment land needs. Land South of Bonehill Road is a site that can assist in meeting this identified need. Overall the Council's aspirations for economic growth are welcomed by Richborough Estates as part of a balanced sustainable strategy.	Comments noted. Employment allocations will be established through the further stages of the local plan review.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO1099	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy OHSC1: Healthy and Safe Communities	The approach to healthy and safe communities in Policy OSHC1 is generally supported. However, the policy states that health and education infrastructure requirements related to strategic development proposals will need to be understood and determined through the Local Plan and accompanying evidence base. Further work is needed on the evidence base and in relation to viability testing regarding infrastructure.	Comments noted. he council continues to gather evidence in support of the local plan. Further viability evidence will be gathered to inform the further stages of the local plan.
LPRPO1100	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy ONR1: Green Belt	As currently drafted, the policy covers both strategic and development management matters related to Green Belt. It is suggested it would be clearer to separate strategic and development management concerns into separate policies. Furthermore, reference is made to national Green Belt policy. However, the policy wording itself then does not reflect national policy. This should be rectified. In terms of the strategic approach to the Green Belt there is an acceptance that there needs to be changes to the Green Belt boundary to accommodate growth requirements at Whittington and Fazeley. Green Belt release needs to be made to deliver a sustainable spatial strategy. The plan also designates three ADRs to be removed from the Green Belt to ensure that the Green Belt boundary is capable of enduring beyond the plan period. The identification of ADR land is supported, however, it is not clear why only three ADRs have been identified and it is questioned whether this will be sufficient to ensure Green Belt boundaries endure beyond 2040, as per the requirements of the NPPF. Policy ONR1 goes on to propose new Green Belt land to define the northern extent of Lichfield city and prevent the coalescence of Lichfield and Fradley. For the proposed new Green Belt between Lichfield city and Fradley it needs to be clearly demonstrated that this meets the relevant tests within the NPPF	Comments noted. The document identifies areas of 'Safeguarded Land' as defined within national policy. National policy states that consideration should be given that where changes to the Green Belt boundary are being proposed then areas of land between the urban area and the Green Belt (Safeguarded Land) should be identified to ensure the Green Belt boundary is capable of enduring beyond the plan period. The preferred options document identifies areas of such safeguarded land in conformity with national planning policy.
LPRPO1101	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Chapter 16: Our Natural Resources	The approach to habitats and biodiversity set out within Policy ONR2 is generally supported where it is consistent with national policy. Policy ONR5 addresses natural and historic landscape. In Lichfield District, there is a single area of landscape which is nationally valued; Cannock Chase Area of Outstanding Natural Beauty (AONB). It is therefore not clear why this policy makes reference to the Green Belt and should instead focus on the AONB and its immediate surroundings. Any policy text regarding beneficial use of the Green Belt should logically be included in the Green Belt policy (ONR1).	Support noted.
LPRPO1102	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy SHA1: Strategic housing allocation North of Lichfield	Strategic Housing Allocation SHA1, located to the north-east of Lichfield, forms the principal housing allocation within the emerging Local Plan. The allocation proposes 3,300 new dwellings on land between two existing housing allocations allocated through the adopted Local Plan; Land North East of Watery Lane and Land at Streethay. Whilst development has started on the Streethay SDA, it has not commenced on the Watery Lane site. Given that the outline consent for the Watery Lane site was granted in February 2017 and Reserved Matters approval for the spine road and green infrastructure was only granted in August 2019, the Council will need to be satisfied that there are no underlying issues preventing delivery of this new wider allocation. There is a lack of evidence either in the Local Plan Review or in the supporting evidence base that the local infrastructure can be viably upgraded to accommodate a development of the scale proposed. Significant work is needed to demonstrate that the local (and strategic – A38) highway network along with other infrastructure such as schools and healthcare could be upgraded to support this level of growth. There will need to be significant input from the County Council, Highways England and other statutory stakeholders to ensure relevant modelling is undertaken to test the allocation and identify if the required infrastructure can be viably delivered. The absence of such evidence highlights questions over the deliverability of the proposed allocation. It is suggested that the Lichfield requirement should be distributed across various sites and settlements rather than concentrated on a single large allocation. This approach would provide greater flexibility and resilience in the delivery of the proposed spatial strategy. Such an appropriate alternative site is Land at Lichfield Road, Kings Bromley	Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed. Policy SHA1 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO1103	Mr S Hawley (Harris Lamb) for Barratt Homes	Whole document	Recognise the effort and focus given to the environment tied into several of the strategic objects and priorities, suggests a strong commitment for enhancing green open space and providing/protecting quality, diverse and sustainable land uses within the built environment. Recognise this approach can be an effective mitigation against adverse weather and climate change by providing benefits covering; flood alleviation, water quality, urban cooling, groundwater recharge, air quality as well as biodiversity and amenity value. Interested in partnership opportunities for retro fitting, Lichfield City and Burntwood town.	Comments noted

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO1104	Burntwood Action Group (BAG)	Chapter 8: Our strategic objectives & priorities	<p>[LDC NOTE - The following response has been prepared by the Burntwood Action Group. Additionally the action group has prepared a representation which has been circulated and has been submitted by 684 individual stakeholders]</p> <p>Words 'minimising', 'mitigating' and 'adapting' within Strategic objective 3 are not good enough. Climate change is very real and we must be planning to reverse the effects of climate change.</p> <p>Strategic objective 9: 'an enlarged and improved town centre for Burntwood which meets the community's needs and aspirations'. This has been our hope and featured within the Local Plan for a number of years. Three years ago BAG produced plans for a town centre which was greeted with enthusiasm by the Town Council, LDC and our MP but no progress has been made. It appears to be a vain hope and we must be realistic. Retailing in the UK has changed dramatically. Also the imminent opening of a large retail outlet at Cannock does not bode well for retail development at Burntwood. Number of 'sites' within the town centre are untouched and eyesores and the Friarsgate project in Lichfield has failed. LDC and BTC through tis neighbourhood plan need to look at options for the vacant land at Sankey's Corner with some urgency. We suggest multi-storey apartments with retail premises on the ground floor in an attractive, landscaped green spaces. Existing premises at Sankey's Corner should be demolished and replaced with similar development. Lack of funding and 'difficult' landowners have been excuses for doing nothing but if LDC spent a fraction of the money which was squandered on Friarsgate something attractive and beneficial to all residents of Burntwood could be achieved.</p> <p>BAG endorses objectives 10 to 15 but the proposal to remove some of Burntwood's Green belt and 'safeguard' it for future housing is in direct opposition to the meeting of the objectives.</p>	Comments noted. The Local Plan includes planning policies relating to climate change. Evidence in relation to climate change is being progressed and will inform the next stages of the Local Plan. Comments noted in respect of town centre. Town centre boundary reflects adopted boundary and is based upon evidence which supports the local plan review.
LPRPO1105	Burntwood Action Group (BAG)	Policy OSS2: Our spatial strategy	<p>[LDC NOTE - The following response has been prepared by the Burntwood Action Group. Additionally the action group has prepared a representation which has been circulated and has been submitted by 684 individual stakeholders]</p> <p>Difficult to see how the level of housing proposed can be sustainable. It will almost certainly result in the loss of green fields and there is no way in which such development can be regarded as environmentally sustainable. LDC has not demonstrated that they might be unable to continue to deliver planned growth at an appropriate rate without safeguarding land and has not shown that there are exceptional circumstances for removing land from the Green Belt. A new settlement would remove the need for removal of land from the Green Belt and if LDC is serious they should start planning for it immediately.</p> <p>Welcome the prioritisation of previously developed land for new housing but questions how LDC will find a 'sustainable extensions to existing settlements'. The manner in which it has identified parcels of land from removal from the Green Belt to extend Burntwood is highly questionable.</p> <p><i>"The important role of the Green Belt will be recognised and protected. Where necessary, changes to the Green Belt boundary will be made."</i> We welcome the first sentence but are alarmed at the possibility of losing some of Burntwood's valuable Green Belt. LDC has not shown that there is a necessity to change the Green Belt Boundary around Burntwood but proposes to take the land off Coulter Lane out of the Green Belt.</p> <p>Despite LDC's persistent assertion that its Green Belt reviews have been "subject to Independent Examination" BAG maintains that the 2013 Green Belt Review Supplementary Report ,the Local Plan Allocations Supplementary Green Belt Report 2016 and the 2019 Green Belt Review contain inaccurate / misleading statements and prejudiced comments leading to inaccurate assessments and should be removed from the Evidence Base.</p> <p>An analysis of elements of the 2013 Supplementary Report and the 2019 Review is attached as a separate appendix.</p>	Comments noted. Green Belt Review is part of the evidence which supports the Local Plan. The Green Belt Review has been prepared based upon a methodology which has been subject to consultation and has taken account of best practice.
LPRPO1106	Burntwood Action Group (BAG)	Policy NS1: New settlement	<p>[LDC NOTE - The following response has been prepared by the Burntwood Action Group. Additionally the action group has prepared a representation which has been circulated and has been submitted by 684 individual stakeholders]</p> <p>BAG welcomes this policy but urges LDC to be more ambitious with the time scale.</p> <p>We anticipate that LDC will wish to update this Local Plan in 5 years time or less and LDC should have plans in place for a new settlement by then. Implementation of the policy should take place shortly afterwards, resulting in a new settlement delivering new homes well before 2040. This makes it unnecessary for LDC to identify 'safeguarded' land at Burntwood.</p>	Comments noted. Policy NS1 demonstrates support for the development of a new settlement within the District beyond the current plan period. Current evidence does not suggest such a proposal is deliverable within the timescales of the current local plan review.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO1107	Burntwood Action Group (BAG)	Policy OSC1: Securing sustainable development	<p>[LDC NOTE - The following response has been prepared by the Burntwood Action Group. Additionally the action group has prepared a representation which has been circulated and has been submitted by 684 individual stakeholders]</p> <p>BAG welcomes this policy but concerned the wording in relation to climate change is not good enough, must be looking to halt or reverse climate change. The proposal to remove some of Burntwood's green surroundings from the Green Belt and safeguard it for future housing development is in direct opposition to most of the key issues.</p> <p>Could BAG's suggestion for multi-storey apartments with retail premises in Burntwood town centre be an innovative solution?</p>	Comments noted. The Local Plan includes planning policies relating to climate change. Evidence in relation to climate change is being progressed and will inform the next stages of the Local Plan.
LPRPO1108	Burntwood Action Group (BAG)	Policy OSC2: Renewables and low carbon energy	<p>[LDC NOTE - The following response has been prepared by the Burntwood Action Group. Additionally the action group has prepared a representation which has been circulated and has been submitted by 684 individual stakeholders]</p> <p>Policy not go far enough. LDC must have building regulations in place which require all new developments to be carbon neutral. This could involve all new buildings to be fitted with solar panels, improved insulation, energy efficient, non-CO2 producing heating systems etc.</p>	Comments noted.
LPRPO1109	Burntwood Action Group (BAG)	Policy OSC3: Sustainable building standards for non-domestic buildings	<p>[LDC NOTE - The following response has been prepared by the Burntwood Action Group. Additionally the action group has prepared a representation which has been circulated and has been submitted by 684 individual stakeholders]</p> <p>New build and retrofitted non-domestic buildings over 1,000sqm should be built to the Building Research Establishments Environmental Assessment Method (BREEAM new construction) 'excellent' standard unless it can be demonstrated that is would make development unviable.</p> <p>The proviso here is unacceptable and should be removed. Any development which contributes to global warming is not viable on a planetary scale.</p>	Comments noted. NPPF makes clear planning policies cannot render development unviable.
LPRPO1110	Burntwood Action Group (BAG)	Policy OST1: Our sustainable transport	<p>[LDC NOTE - The following response has been prepared by the Burntwood Action Group. Additionally the action group has prepared a representation which has been circulated and has been submitted by 684 individual stakeholders]</p> <p>The transport conditions specified for any development proposal would almost certainly preclude development off Coulter Lane which is almost a mile from Burntwood's closest amenities. The traffic from the St Matthews estate causes chaos on Church Road at school opening and closing times. If it wasn't for the pedestrian crossing warden at the junction of Church Road with Rugeley Road there would almost certainly be serious traffic/pedestrian accidents.</p>	Comments noted. There is no development at Coulter Lane proposed within the Preferred Options document.
LPRPO1111	Burntwood Action Group (BAG)	Policy OHF4: Affordable housing	<p>[LDC NOTE - The following response has been prepared by the Burntwood Action Group. Additionally the action group has prepared a representation which has been circulated and has been submitted by 684 individual stakeholders]</p> <p>BAG's suggestion for multiple storey apartments with retail premises on the ground floor at Burntwood Town Centre could fulfil Burntwood's need for affordable housing.</p>	Comments noted. Affordable housing need across the District is established within the evidence.
LPRPO1112	Burntwood Action Group (BAG)	Policy OEET2: Our centres	<p>[LDC NOTE - The following response has been prepared by the Burntwood Action Group. Additionally the action group has prepared a representation which has been circulated and has been submitted by 684 individual stakeholders]</p> <p>Would like to draw LDC's attention to the need for refurbishment of all of Burntwood's satellite shopping centres. BAG urges LDC to commission a masterplan for Burntwood Town Centre to include such facilities (Leisure uses, cultural development and balanced evening and night time economy) with our proposals for multi storey apartments/retail premises.</p>	Comments noted.
LPRPO1113	Burntwood Action Group (BAG)	Policy OEET4: Tourism	<p>[LDC NOTE - The following response has been prepared by the Burntwood Action Group. Additionally the action group has prepared a representation which has been circulated and has been submitted by 684 individual stakeholders]</p> <p>The Local Plan and/or Burntwood's Neighbourhood Plan need to include detailed plans for the development of Chasewater as a tourist attraction. We urge those bodies developing such plans to factor in the improvement of pedestrian and cycle ways from Burntwood Town Centre to Chasewater.</p>	Comments noted. Policy in preferred options document specifically notes Chasewater Country Park as one of the Districts tourism assets. Policy supports developments which would enhance such assets.
LPRPO1114	Burntwood Action Group (BAG)	Policy OHSC1: Healthy & safe communities	<p>[LDC NOTE - The following response has been prepared by the Burntwood Action Group. Additionally the action group has prepared a representation which has been circulated and has been submitted by 684 individual stakeholders]</p> <p>We reiterate the point which BAG has made on many occasions: All of Burntwood's green surroundings are needed for the health and wellbeing of its residents.</p>	Comments noted.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO1115	Burntwood Action Group (BAG)	Policy OSR2: Open Space and recreation	<p>[LDC NOTE - The following response has been prepared by the Burntwood Action Group. Additionally the action group has prepared a representation which has been circulated and has been submitted by 684 individual stakeholders]</p> <p>We reiterate another point which members of BAG are passionate about: The fields and lanes around Burntwood are used extensively for walking on or around and such activity must be acknowledged as being as important as more formal leisure activities.</p>	Comments noted.
LPRPO1116	Burntwood Action Group (BAG)	Policy ONR1: Green Belt	<p>[LDC NOTE - The following response has been prepared by the Burntwood Action Group. Additionally the action group has prepared a representation which has been circulated and has been submitted by 684 individual stakeholders]</p> <p>LDC has not demonstrated a strategic need to make changes to the Green Belt boundary. If LDC approaches the planning and implementation of a new settlement outside the Green Belt with more urgency and uses all available brownfield sites there would be no such strategic need to use any of Burntwood's Green Belt.</p> <p>LDC has made no attempt to show that there will be a necessity to 'safeguard' land around Burntwood and we see no mention of exceptional circumstances to justify Green Belt removal. Since the 1950s Burntwood has been used to house overspill from Birmingham and the Black Country. The resulting developer led development has resulted in vast swathes of green land, which once separated and surrounded the villages of Chasetown, Chase Terrace, Boney Hay and Burntwood being lost to housing estates. All the green land which now surrounds the conurbation of Burntwood is needed for the health and wellbeing of its inhabitants.</p> <p>The sites off Coulter Lane help to frame what is left of the ancient settlement of Burntwood and if it is lost to housing LDC will have destroyed the rural setting of the old Burntwood village. The land is highly valued by a huge number of Burntwood's inhabitants and it is vital for their health.</p>	Comments noted. The preferred options document states there is a strategic need to amend the Green Belt boundary within the District. Such changes are proposed, additionally 'safeguarded land' is identified in accordance with guidance within the NPPF. Green Belt Review 2019 makes clear that 'exceptional circumstances' would need to be demonstrated if changes to the Green Belt boundary are proposed. This has been judged to be the case in the preferred options document as stated at paragraph 16.5 in terms of meeting development needs and the identification of new Green Belt to the north of Lichfield City.
LPRPO1117	Burntwood Action Group (BAG)	Policy B2: Burntwood Environment	<p>[LDC NOTE - The following response has been prepared by the Burntwood Action Group. Additionally the action group has prepared a representation which has been circulated and has been submitted by 684 individual stakeholders]</p> <p>LDC need to realise the stupidity of the second sentence of the second paragraph of the policy. If development of such a site is allowed to take place the corridor will be broken and no off-site mitigation could bring it back. Land off Coulter Lane functions as such a site, providing part of the corridor from Cannock Chase and Gentleshaw Common to sites further south. If LDC continues with its plan to remove the land from the Green belt it will negate any efforts to achieve the key issues 8,9,11,12,13,14,15.</p>	Comments noted.
LPRPO1118	Burntwood Action Group (BAG)	Vision for Burntwood	<p>[LDC NOTE - The following response has been prepared by the Burntwood Action Group. Additionally the action group has prepared a representation which has been circulated and has been submitted by 684 individual stakeholders]</p> <p>Burntwood will maintain its role as a separate and freestanding community, bounded by the Green Belt and functioning as a town which offers a range of services and facilities that meet residents, businesses and visitor's needs.</p> <p>How can the proposal to 'safeguard' land off Coulter Lane for future development fit with this vision for Burntwood?</p> <p>It is a proposal which must be abandoned immediately.</p>	Comments noted. The preferred options document proposes safeguarded land in accordance with guidance within the NPPF.
LPRPO1119	Mr S Hawley (Harris Lamb) for Barratt Homes	Policy OHF1: Housing Provision	<p>Housing figure is inappropriate as it fails to make a sufficient contribution toward unmet housing requirements of the conurbation and no buffer is added. Should also explore whether or not exceptional circumstances exist to use a non Standard Method housing requirement. As a consequence, the housing requirement of the Plan should be increased. Table 13.1 - Overall Distribution of housing makes provision for less than minimum housing requirement. Concern with the number of strategic allocations and their ability to deliver given the lack of evidence, consider a greater proportion of development should be directed to the Larger Service Villages to ensure development will be delivered in the short term which would accord with the vision. Locating the majority of new housing in Lichfield City will result in sites competing with one another for sales this will slow down delivery, should be to direct development toward the most sustainable locations within the District, including the Larger Services Villages as Lichfield District has a poor track record of delivering strategic allocations.</p>	<p>Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review.</p> <p>The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period.</p>
LPRPO1120	Mr S Hawley (Harris Lamb) for Barratt Homes	Chapter 13: Our homes for the future	<p>Amend to make the mix requirements less prescriptive. Housing required will vary in different parts of the District and will change over time. Suggest remove table and put in supporting text advising it provides a 'snap shot' of what the current property requirements. The mix of properties on residential schemes should be the subject of discussion between the Council and developers, as part of the pre-application and development control process.</p>	No change proposed, the suggested change will weaken the policy requirement and the evidence is based upon lifetime of the plan.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO1121	Mr S Hawley (Harris Lamb) for Barratt Homes	Policy OHF4: Affordable Housing	Note that affordable housing need is identified as being the equivalent of 80% of the District's housing requirement, should explore whether an alternative approach to establishing the overall housing requirement other than the Standard Method should be explored, as exceptional circumstances would appear to exist to support a higher level of growth to deliver much needed affordable housing. Further viability testing will be required to establish the rate of affordable housing and quantum so should publish this prior to preparation of Submission.	Comments noted. Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review.
LPRPO1122	Mr S Hawley (Harris Lamb) for Barratt Homes	Policy ONR1: Green Belt	Believe a greater quantum of land needs to be removed from the Green Belt in order to accommodate the Plan's housing requirement and an appropriate distribution of development. Local Authorities should be able to demonstrate they will not need to amend the boundaries again at the end to the Plan period Local Authorities should be able to demonstrate they will not need to amend the boundaries again at the end to the Plan period. Consider further land needs to be allocated, or safeguarded to support the sustainable growth of Larger Service Villages such as Whittington.	Comments noted. A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO1123	Mr S Hawley (Harris Lamb) for Barratt Homes	Policy OSS2: Our Spatial Strategy	Housing Distribution - no objection to the larger settlement accommodating a significant proportion of the Plan's development requirements, is inconsistent with the stated approach set out within the Objectives and Priorities to grow and maintain sustainable rural communities. Also the shortfall in housing delivery in the earlier part of the Plan period, delivery of strategic allocations within and adjacent to Lichfield City has been slower than anticipated. Therefore have significant concerns on reliance upon Lichfield City in delivering the vast majority of the housing requirement. The track record of delivering Strategic Sites in the District does not provide justification for a new settlement option. A more realistic delivery rate should be applied to the Lichfield City allocations, consequently reducing the amount of development expected in Lichfield City during the course of the Plan period. We have significant concerns about the inclusion of a strategic allocation SHA1 without evidence being provided in order to demonstrate its deliverability from a technical perspective. The Plan should be amended to place a greater emphasis on delivery within the Larger Service Villages. Housing Requirement - needs to be considered whether or not exceptional circumstances exist to warrant an alternative approach. Separate study provided justifies it due to higher number of older people, smaller working age population, aspiration to deliver employment growth need to ensure there is a sufficient number of people of working age to fill the number of jobs within the District. Higher average house price will make accessing the housing market more difficult for local residents, housing requirement should be increased in order to facilitate the delivery of a larger number of smaller properties, in order to address this imbalance. Shortfall in affordable housing delivery. Birmingham and Black Country allowance - no agreement between the Authorities on the final distribution of needs, combined housing shortfall arising for the Black Country and Birmingham City, based on current evidence, is 67,188 dwellings. Lichfield which have a significant boundary with both the Black Country and Birmingham should be required to take a greater proportion of the overall housing requirement. No justification for a 4,500 figure within the Plan and in our view it should be increased to a minimum of 7,485 dwellings, based upon the proportional distribution approach. Buffer - no provision within the plan for the proposed housing allocations not coming forward for development as expected it is suggested a buffer should be identified through the Local Plan review of around 20%-25%. Policy OSS2 should be revised in order to range 17,898 - 18,436 as the minimum housing requirement.	Comments noted. Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review. The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period. Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO1124	Mr S Hawley (Harris Lamb) for Barratt Homes	Policy SHA1: Strategic housing allocation North of Lichfield	Significant concerns regarding delivery: lack of information, unknown access strategy, no IDP or information to suggest how the site can be brought forward and within the timeframe identified. Site will be competing for sales and market will slow down due to market saturation.	Comments noted. Policy SHA1 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO1125	Mr S Hawley (Harris Lamb) for Barratt Homes	Chapter 3: national context	Object to preparation of two part plan.	Comment noted.
LPRPO1126	Mr S Hawley (Harris Lamb) for Barratt Homes	Chapter 13: Our homes for the future	Table 3.1 The emerging consultation plan relies upon existing undelivered Local Plan allocations providing 6,093 dwellings of the total housing requirement. Based upon the Council's figures, this is half of the minimum overall need (without any allowance for a buffer). The Local Plan Strategy has been adopted for close to five years. The fact a number of strategic allocations within this document have not delivered to date, despite the fact they are allocated from the Plan, suggests there may be problems with their delivery. All existing allocations should be considered again to ensure they are suitable for reallocation. They should be given no preference over other alternative allocations within the emerging plan.	Comments noted. Urban capacity assessment has been prepared in 2016 and 2019 in support of the Local Plan Allocations and Local Plan review. Tis [provides detailed consideration of potential sites/allocations including those allocated within the existing local plan.
LPRPO1127	Mr S Hawley (Harris Lamb) for Barratt Homes	Policy W1: Whittington environment services and facilities	Not enough development to support the growth of Whittington and to protect and grow its services and facilities and reflect its status within the settlement hierarchy. Land to the east of Whittington, Sheepwash Farm is a more appropriate suitable location for development than the proposed allocation, it has limited impact on the Green Belt, will not extend built form, is contained by the rail line, opportunity for public open space, improve canal and is deliverable.	Comments noted. Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO1128	Mr S Hawley (Harris Lamb) for Barratt Homes	Policy W2: Whittington economy	Not enough development to support the growth of Whittington and to protect and grow its services and facilities and reflect its status within the settlement hierarchy. Land to the east of Whittington, Sheepwash Farm is a more appropriate suitable location for development than the proposed allocation, it has limited impact on the Green Belt, will not extend built form, is contained by the rail line, opportunity for public open space, improve canal and is deliverable.	Comments noted. Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO1129	Mr S Hawley (Harris Lamb) for Barratt Homes	Policy SHA4: Strategic housing allocation land of Huddlesford Lane	Not enough development to support the growth of Whittington and to protect and grow its services and facilities and reflect its status within the settlement hierarchy. Land to the east of Whittington, Sheepwash Farm is a more appropriate suitable location for development than the proposed allocation, it has limited impact on the Green Belt, will not extend built form, is contained by the rail line, opportunity for public open space, improve canal and is deliverable.	Comments noted. Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO1130	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Chapter 7: Our vision	<p>It is noted that Vision remains broadly the same as that presented in the adopted Local Plan Strategy. It should be made clear that this long-term growth relates to a contribution to growth beyond the plan period. The statement that the Council has an 'aspiration' to deliver housing and employment growth within the District is not strong enough and should be amended to state there is a 'commitment', rather than an 'aspiration', to delivering such growth.</p> <p>The Council does not consider it necessary for the Vision to make specific reference to meeting the unmet housing needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). It is not clear how the Council has reached this view. Document would benefit from clearer referencing throughout in order to clearly demonstrate how the spatial strategy relates back to the Vision, Strategic Objectives and Priorities, as well as to its evidence base. At present there is a lack of detail in the Plan which is needed to demonstrate the viability and deliverability of the strategy (for example amounts of affordable housing required, open space standards) and robust evidence will need to be produced to enable meaningful engagement to ensure a sound plan.</p>	Comments noted. Submission document will include references and links to evidence base documents and links to strategic objectives.
LPRPO1131	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy OSS2: Our Spatial Strategy	<p>The pro-active approach taken to providing a contribution of dwellings towards the GBBCHMA shortfall is welcomed. However, it is not clear how the figure of 4,500 dwellings has been identified. It should be clarified in Strategic Policy OSS2 how the figure of 4,500 dwellings has been derived and the evidence upon which this is based. The Local Plan Review should accordingly consider the Areas of Search identified in the Strategic Growth Study and, where options have not been pursued, clearly set out the evidence and reason for this.</p> <p>The overall settlement hierarchy as set out in the Preferred Options is generally supported. The proposed allocations for growth do not reflect the preferred growth option previously identified by the Council and appear at odds with the settlement hierarchy outlined within the policy. It is contended that Policy OSS2 is not justified and does not provide a considered and justified spatial strategy. The Policy does not reflect how growth is to be distributed in line with the settlement hierarchy; instead simply stating the draft Plan's allocations without recourse to their role in delivering a balanced plan.</p>	Comments noted. Spatial strategy and proposed allocations along with committed supply considered sufficient to meet housing requirement established within preferred options document. The purpose of safeguarded land is set out within the NPPF. Considered to be in line with NPPF to identify such designations which are not for development within the plan period.
LPRPO1132	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy OSC1: Securing sustainable development	The approach to sustainable development set out in Policy OSC1 is generally supported where it is consistent with national policy. However, certain aspects of the policy as currently drafted should be refined. The approach to Policy OSC4 and Policy OSC5 is generally supported, however, should be updated to reflect national design policy guidance.	Comments noted. Policy wording to be considered in light of evidence supporting the local plan.
LPRPO1133	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy INF1: Delivering our Infrastructure	<p>Policy INF1 is aimed to providing the infrastructure required by the District's communities and businesses and safeguarding existing infrastructure. This is supported; however, it is considered there needs to be additional evidence published in support of the Local Plan Review regarding infrastructure in order to provide clarity over what additional infrastructure is required.</p> <p>This evidence should include an update to the Infrastructure Delivery Plan (IDP) and further consultation with the County Council and other relevant consultees on matters such as highways modelling and education provision. Without such evidence, the viability and deliverability of such allocations is questionable.</p>	Comments noted. Further evidence in relation to infrastructure will support the local plan review process.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO1134	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy OHF1: Housing Provision	<p>There are four strategic development allocations/areas listed in Policy OHF1 alongside the approximate number of new homes they will deliver. These allocations reflect the new allocations for growth set out in Strategic Policy OSS2. However, it is not clear how the proposed allocations relate to the spatial strategy or settlement hierarchy. Additionally, there is no reasoning which sets out the inconsistency with the current adopted spatial strategy. The proposed levels of growth vary significantly between settlements, including between those at the same level in the settlement hierarchy. It is not clear how the spatial strategy has led to this and this needs to be demonstrated and justified, along with further details (and requirements and potential allocations) relating to those settlements which have been omitted., the current strategy is heavily reliant on a single large site to deliver the overall housing requirement (land north-east of Lichfield) However, this is not supported by detailed evidence to show that work has progressed sufficiently to demonstrate deliverability of this during the plan period. Concern has already been raised within this representation concerning the infrastructure requirements and deliverability issues in relation to the provision of a new settlement. These concerns are equally applicable to the allocation of 3,300 new dwellings in a single location north-east of Lichfield. Further commentary on this allocation is provided later in this Representation, in respect of Policy SHA1.</p>	Comments noted. A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO1135	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy OHF2: Providing a balanced housing market and optimising housing density	<p>Richborough Estates is concerned that, in its current form, this policy lacks sufficient flexibility to meet changing housing needs across the District and across the plan period, by referring to specific percentage figures. In seeking to specify a mix, the policy lacks flexibility to reflect differences across the District's sub-market areas; changing needs over the plan period and site-specific considerations which will often influence the mix that can be delivered on individual sites. Furthermore, this plan proposes 4,500 additional homes to meet the needs of the GBBCHMA. The housing needs of neighbouring authorities will accordingly also be crucial consideration in determining housing mix on developments meeting cross boundary requirements. Policy OHF2 should contain flexibility to reflect this. The policy also sets out minimum net density of 35 dwellings per hectare. This is considered to be broadly appropriate. Developments in Lichfield City, Burntwood Town and locations with good public transport links will be expected to achieve higher densities of approximately 50 dwellings per hectare. It is questioned if this is actually achievable, or indeed appropriate on many sites in Lichfield and Burntwood, particularly those outside of the centres where regard should also be had to context and setting. It is suggested that an amendment to the policy to focus this higher level of density upon centres, with more flexibility to the wider urban areas (see NPPF paragraph 123 a) would be a more sensible approach.</p>	Comments noted. Evidence within the HEDNA suggests the Council will be justified in seeking to achieve as much affordable housing as viably possible on appropriate development sites. Further viability evidence is being collected which will inform the policy and provide a clear position in terms of the appropriate level of affordable housing to be sought.
LPRPO1136	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy OHF4: Affordable Housing	<p>The lack of a specific affordable housing threshold in the policy does not accord with either the NPPF or the Viability and Plan Making section within PPG. National policy clearly requires a Local Plan to set an affordable housing percentage which this policy currently lacks. The policy also seeks to allow flexibility in the tenure, size and type of affordable housing on a scheme by scheme basis. This flexibility is supported and should be delivered with reference to the most up-to-date Strategic Housing Market Assessment (SHMA).</p>	Comments noted. Evidence within the HEDNA suggests the Council will be justified in seeking to achieve as much affordable housing as viably possible on appropriate development sites. Further viability evidence is being collected which will inform the policy and provide a clear position in terms of the appropriate level of affordable housing to be sought.
LPRPO1137	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy OEET1: Our employment and economic development	<p>This policy states that approximately 61 hectares of land will be allocated for employment use in It is not clear why the current consultation document has not identified any employment sites and it should be clarified how the Council intends to deliver its employment land needs.</p>	Comments noted. Employment allocations will be established through the further stages of the local plan review.
LPRPO1138	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy OHSC1: Healthy & safe communities	<p>The approach to healthy and safe communities in Policy OSHC1 is generally supported. However, the policy states that health and education infrastructure requirements related to strategic development proposals will need to be understood and determined through the Local Plan and accompanying evidence base so that it is clearly demonstrated that the strategic allocations are deliverable and viable.</p>	Comments noted. he council continues to gather evidence in support of the local plan. Further viability evidence will be gathered to inform the further stages of the local plan.
LPRPO1139	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy ONR1: Green Belt	<p>As currently drafted, the policy covers both strategic and development management matters related to Green Belt. It is suggested it would be clearer to separate strategic and development management concerns into separate policies and needs to reflect the NPPF. Further 'non-strategic' changes to the Green Belt may be appropriate, but the precise boundaries will be determined through neighbourhood plans or the allocations document. This approach is not appropriate, given the strategic importance of Green Belt delivering the overall proposed spatial strategy for the District. It is not clear currently why only three ADRs have been identified and it is questioned whether this will be sufficient to ensure Green Belt boundaries endure beyond 2040, in line with the requirements of the NPPF. For the proposed new Green Belt between Lichfield City and Fradley, it needs to be clearly demonstrated that this meets the tests of the NPPF.</p>	Comments noted. The document identifies areas of 'Safeguarded Land' as defined within national policy. National policy states that consideration should be given that where changes to the Green Belt boundary are being proposed then areas of land between the urban area and the Green Belt (Safeguarded Land) should be identified to ensure the Green Belt boundary is capable of enduring beyond the plan period. The preferred options document identifies areas of such safeguarded land in conformity with national planning policy.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO1140	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy ONR2: Habitats and Biodiversity	The approach to habitats and biodiversity set out within Policy ONR2 is generally supported where it is consistent with national policy. The draft policy continues to include the biodiversity net gain requirement. Policy ONR5 addresses natural and historic landscape. In Lichfield District, there is a single area of landscape which is nationally valued; Cannock Chase Area of Outstanding Natural Beauty (AONB). It is contended that Green Belt is not a landscape designation and is not a 'valued' landscape. It is therefore not clear why this policy makes reference to the Green Belt.	Support noted.
LPRPO1141	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy SHA1: Strategic housing allocation North of Lichfield	Concerns regarding the deliverability of the above allocation within the plan period. The NPPF requires planning policies to identify a sufficient supply and mix of sites that can be delivered across years 1 to 15 of the plan period (paragraph 67). The Council's housing trajectory needs to clearly consider the impacts of allocating approximately 70% of the proposed dwellings to be allocated through this Plan to a single site. There are significant infrastructure requirements for allocations of this size and there is a very real risk that this allocation will not deliver much-needed new homes until the end of the plan period (2040). Such delays would leave a major shortage of housing provision at the beginning of the plan. The physical separation of the proposed allocation from Lichfield by this existing infrastructure will pose a challenge in place making terms to create a sustainable community which integrates with the existing residents in the area. There is a lack of evidence either in the Local Plan Review or in the supporting evidence base that the local infrastructure can be viably upgraded to accommodate a development of the scale proposed. This allocation aims to deliver 3,300 dwellings in a single location. This equates to 70% of the total dwellings allocated in this Plan. For the reasons outlined above, it is questionable if this allocation will be able to deliver this number of units in this location. It is suggested that the Lichfield City requirement should be distributed across various sites and settlements rather than concentrating on a single large allocation. This approach would provide greater flexibility and deliverability in the delivery of the proposed spatial strategy.	Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed. Policy SHA1 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO1142	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Policy SHA4: Strategic housing allocation land of Huddlesford Lane	Allocation is supported by Richborough Estates. Policy SHA4 identifies a number of design and infrastructure principles which are broadly supported by Richborough Estates. However, it is considered that some of the principles are not in accordance with national policy or guidance. The infrastructure requirements are predominantly geographically unique, based upon local supply and demand. The infrastructure requirements identified within the plan are not evidenced and appear to have been unjustifiably duplicated across the allocations. They should accordingly be revised.	Comments noted. Policy SHA4 includes requirement for appropriate infrastructure as part of the development of the site. The proposed strategic allocations have been identified and based upon a range of evidence.
LPRPO1143	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Section 12: Our Sustainable Transport	The approach to sustainable transport set out in the policies in this section is broadly supported. However, the requirement for all major development proposals to produce a travel plan is too onerous for smaller developments as it would apply to all development of 10 or more dwellings. This threshold should be revised to a higher level. It is noted that parking provision will continue to be determined with reference to the Sustainable Development Supplementary Planning Document (SPD). This is not in line with national policy and should be reviewed. It is noted that the policy provides greater flexibility for the provision of parking to be considered for specific development proposals and this is supported.	Comments noted. Supplementary Planning Documents supported the adopted local plan. Revision to or new SPD's will be considered in due course following the local plan review.
LPRPO1144	S Hawley (Harris Lamb) for Bloor Homes	Whole document	Green Belt Review: No full assessment of "Broad Area" BA11, which lies to the north of the A454. Land to the north of Little Aston Lane both perform "Moderate" roles and are therefore, less sensitive than the location is to the south of Little Aston Lane that perform "Important" Green Belt roles. This clearly suggests that the land in this location is the least sensitive location for Green Belt land release at Little Aston.	Comments noted. Comments noted. The Green Belt Review provides a comprehensive strategic assessment of all parts of the green belt.
LPRPO1145	S Hawley (Harris Lamb) for Bloor Homes	Policy NS1: New Settlement	No particular objection to this approach in theory, there is no explanation within the Plan as to why the opportunity to extend the built-up edge of Birmingham is not being considered as an option to accommodate future development. Sustainable location, significant proportion of Lichfield's housing requirement is required to meet the growth requirements of Birmingham City. Not clear why the Plan raises the possibility of a new settlement in subsequent Local Plans, whilst ignoring the possibility of an urban extension to the edge of Birmingham.	Comments noted.
LPRPO1146	S Hawley (Harris Lamb) for Bloor Homes	Policy OHF1: Housing Provision	Housing figure is inappropriate as it fails to make a sufficient contribution toward unmet housing requirements of the conurbation and no buffer is added. Should also explore whether or not exceptional circumstances exist to use a non Standard Method housing requirement. As a consequence, the housing requirement of the Plan should be increased. Table 13.1 - Overall Distribution of housing makes provision for less than minimum housing requirement. Concern with the number of strategic allocations and their ability to deliver given the lack of evidence, consider a greater proportion of development should be directed to the Larger Service Villages to ensure development will be delivered in the short term which would accord with the vision. Locating the majority of new housing in Lichfield City will result in sites competing with one another for sales this will slow down delivery, should be to direct development toward the most sustainable locations within the District, including the Larger Services Villages as Lichfield District has a poor track record of delivering strategic allocations.	Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review. The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period.
LPRPO1147	S Hawley (Harris Lamb) for Bloor Homes	Chapter 13: Our homes for the future	Amend to make the mix requirements less prescriptive. Housing required will vary in different parts of the District and will change over time. Suggest remove table and put in supporting text advising it provides a 'snap shot' of what the current property requirements. The mix of properties on residential schemes should be the subject of discussion between the Council and developers, as part of the pre-application and development control process.	No change proposed, the suggested change will weaken the policy requirement and the evidence is based upon lifetime of the plan.

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO1148	S Hawley (Harris Lamb) for Bloor Homes	Policy OHF4: Affordable Housing	Note that affordable housing need is identified as being the equivalent of 80% of the District's housing requirement, should explore whether an alternative approach to establishing the overall housing requirement other than the Standard Method should be explored, as exceptional circumstances would appear to exist to support a higher level of growth to deliver much needed affordable housing. Further viability testing will be required to establish the rate of affordable housing and quantum so should publish this prior to preparation of Submission.	Comments noted. Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review.
LPRPO1149	S Hawley (Harris Lamb) for Bloor Homes	Policy ONR1: Green Belt	Believe a greater quantum of land needs to be removed from the Green Belt in order to accommodate the Plan's housing requirement and an appropriate distribution of development. Support safeguarded land consider additional safeguarded land required. Local Authorities should be able to demonstrate they will not need to amend the boundaries again at the end to the Plan period Local Authorities should be able to demonstrate they will not need to amend the boundaries again at the end to the Plan period. Consider further land needs to be allocated, or safeguarded in Little Aston given the significant proportion of the housing requirement arises from Birmingham and this is a highly sustainable location for development.	Comments noted. A site selection paper discusses the approach to identification of proposed strategic sites. A Suite of evidence is used in forming a planning judgement as to the appropriate distribution and location of growth to meet requirements. The location of proposals will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO1150	S Hawley (Harris Lamb) for Bloor Homes	Policy OSS2: Our Spatial Strategy	Housing Requirement - needs to be considered whether or not exceptional circumstances exist to warrant an alternative approach. Separate study provided justifies it due to higher number of older people, smaller working age population, aspiration to deliver employment growth need to ensure there is a sufficient number of people of working age to fill the number of jobs within the District. Higher average house price will make accessing the housing market more difficult for local residents, housing requirement should be increased in order to facilitate the delivery of a larger number of smaller properties, in order to address this imbalance. Shortfall in affordable housing delivery. Birmingham and Black Country allowance - no agreement between the Authorities on the final distribution of needs, combined housing shortfall arising for the Black Country and Birmingham City, based on current evidence, is 67,188 dwellings. Lichfield which have a significant boundary with both the Black Country and Birmingham should be required to take a greater proportion of the overall housing requirement. No justification for a 4,500 figure within the Plan and in our view it should be increased to a minimum of 7,485 dwellings, based upon the proportional distribution approach. Buffer - no provision within the plan for the proposed housing allocations not coming forward for development as expected it is suggested a buffer should be identified through the Local Plan review of around 20%-25%. Policy OSS2 should be revised in order to range 17,898 - 18,436 as the minimum housing requirement.	Comments noted. Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review. The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period.
LPRPO1151	S Hawley (Harris Lamb) for Bloor Homes	Chapter 3: national context	Object to preparation of two part plan. Timescale to prepare the part two plan. Inappropriate to rely on neighbourhood plans as a shortfall may arise.	Comments noted.
LPRPO1152	S Hawley (Harris Lamb) for Bloor Homes	Policy SHA1: Strategic housing allocation North of Lichfield	Significant concerns regarding delivery: lack of information, unknown access strategy, no IDP or information to suggest how the site can be brought forward and within the timeframe identified. Site will be competing for sales and market will slow down due to market saturation. O	Comments noted. Policy SHA1 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO1153	S Hawley (Harris Lamb) for Bloor Homes	Chapter 13 : Our homes for the future	Table 3.1 The emerging consultation plan relies upon existing undelivered Local Plan allocations providing 6,093 dwellings of the total housing requirement. Based upon the Council's figures, this is half of the minimum overall need (without any allowance for a buffer). The Local Plan Strategy has been adopted for close to five years. The fact a number of strategic allocations within this document have not delivered to date, despite the fact they are allocated from the Plan, suggests there may be problems with their delivery. All existing allocations should be considered again to ensure they are suitable for reallocation. They should be given no preference over other alternative allocations within the emerging plan.	Comments noted. Urban capacity assessment has been prepared in 2016 and 2019 in support of the Local Plan Allocations and Local Plan review. Tis [provides detailed consideration of potential sites/allocations including those allocated within the existing local plan.
LPRPO1154	Tom Helliwell (Class Q Ltd) on behalf of Roy Cork	Whole document	Promotes land at Streethay farm for consideration for a residential allocation. Land is deliverable within a five year period and comprises circa 42.6 acres of redundant Grade III agricultural land. Don't foresee any issues with flooding, access, ecology, archaeology, landscape or deliverability. Site represents a logical addition to the current proposed residential allocation to the north of the A38. Site adheres to the local plans vision for Lichfield City. Site could incorporate significant areas of Public Open Space and makes use of the beautiful canal and marina features on the eastern flank. Additional land to the north, east and south may be available if required.	Comments noted.

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LPRPO1155	Kate Dewey (Staffordshire Wildlife Trust)	Whole document	<p>NPPF and PPG set out how the natural environment should be considered in plan making and gathering a robust evidence base. NPPF paragraphs most relevant to biodiversity in the District include: 170, 171, 174 which can be broadly summarised into the need to:</p> <ol style="list-style-type: none"> 1. Identify, map and safeguard wildlife-rich sites and networks, including the environmental value of potential allocation sites. 2. Recognise natural capital and ecosystem services 3. Minimise impacts to, restore and enhance priority habitats, species and ecological networks. 4. Plan for coherent ecological networks and green infrastructure at a large scale 5. Secure measurable net gains for biodiversity. <p>PPG sets out further the evidence needs in identifying and mapping local ecological networks, Paragraph 11 lists the relevant evidence needed and Paragraph 13 deals with identifying and safeguarding Local Wildlife Sites (LWS). Evidence base gathered so far to inform the Local Plan does not appear to fulfil the requirements in the NPPF and PPG above.</p> <p>Existing data on LWS, irreplaceable and priority habitats for most districts in Staffordshire is substantially out-of-date and is not comprehensive. Existing sites are often expanded or their designation status changed as survey information is updated. The Ancient Woodland Inventory for England, is only provisional, as most woods under 2 hectares in size have never been assessed. Surveys by HS2 several newly discovered ancient woodlands have been added to the inventory, there are likely to be many more across the county. Habitat survey coverage in South Staffordshire stands at just over 56%. Although Housing Site Selection Paper and the Housing Site Selection Methodology Paper include consideration of the biodiversity role of sites, unclear whether up-to-date surveys have been undertaken. To form a robust evidence base and plan for nature at a strategic level, we recommend that:</p> <ol style="list-style-type: none"> 1. Where there are gaps in data, areas where development is likely to take place, LWS, important habitats and key areas for priority species are identified, mapped and designated where appropriate. E.g.; safeguarded land, greenbelt potentially to be released, areas of search for significant urban extensions, and area of search for a new settlement. 2. Potential allocation sites are surveyed for ecological and geological constraints to inform site selection at an appropriate stage in the sifting. 3. Brownfield sites are assessed for their environmental value. 4. A Green Infrastructure Strategy be produced, informed by the ecological networks plan and other ecosystem services evidence such as Flood risk and Open Space evidence, to plan where new multifunctional green areas can fill gaps in the existing resources. Costed projects can then be fed into an Infrastructure Delivery Strategy. 	Commented noted. Preferred options document supported by significant evidence base including relating to ecology and biodiversity.
LPRPO1156	Cannock Chase Area of Outstanding Natural Beauty (AONB)	Policy OEET4: Tourism	Need to balance with the statutory requirement to minimise impacts on the AONB. Therefore appropriate to refer to the requirements of the Act to conserve and enhance the special qualities and natural beauty of the AONB.	Comments noted.
LPRPO1157	AONB	Policy ONR1: Green Belt	Concerns regarding potential sites for Green Belt release within the setting of the AONB. Retention of Green Belt in the setting of the AONB as shown on the Policy Maps is therefore warmly welcomed. The strategic need to adjust Green Belt boundaries is understood, and it is noted that an area of development restraint has been identified at Land at Coulter Lane Burntwood and removed from the Green Belt. This lies approximately 1.5km to the south of the AONB and therefore could be of concern, however desk-based assessment suggests the site would not be visible from the AONB due to intervening landform. Nevertheless, potential effects on the AONB should be fully considered should this site be considered for development at a later date.	Comments noted. No proposals to release land from the Green Belt for development within proximity of the AONB.
LPRPO1158	AONB	Policy ONR4: Green infrastructure and connectivity	Support for initiatives that address ecological connectivity, with particular reference to Cannock Chase AONB is welcomed and accords with the AONB management plan.	Support noted.
LPRPO1159	AONB	Policy ONR5: Natural and historic landscapes	Warmly welcomed with extensive reference to protection and enhancement of Cannock Chase AONB and its setting, including key views. In Para 16.34 inclusion of reference to the AONB Management Plan, and its consideration in development proposals is also welcomed. List of appropriate legislation provided and advise that further evidence is being prepared by the AONB on views, development visible in views and a design guide later in 2020 AONB would welcome reference to these in Local Plan Policy at the appropriate time.	Comments noted.
LPRPO1160	AONB	Policy B2: Burntwood Environment	Recognition of the sensitivity of landscapes around Burntwood and their importance to the AONB in terms of landscape, setting and ecological connectivity is strongly supported.	Comments noted.
LPRPO1161	Tamworth Borough Council	Policy OSS2: Our Spatial Strategy	Not clear how sites allocated in the 2019 local plan allocations document will be treated as part of the new local plan. The Council would appreciate some clarification on whether sites marked as 'existing housing allocations' on the policies maps are intended to be brought forward into the new plan. Tamworth Borough Council signed a statement of common ground with Lichfield District Council (LDC) and North Warwickshire Borough Council (NWBC) in September 2018 in which LDC committed to provide 912 dwellings towards Tamworth's unmet need. There is no specific reference within the preferred options document to providing for Tamworth's unmet need; it simply states that 4,500 dwellings will be provided towards meeting the Greater Birmingham and Black Country housing market area shortfall. It is assumed that any unmet need arising from Tamworth would be met within this overall unmet need. The joint Lichfield and Tamworth Housing and Economic Development Need Assessment (HEDNA), demonstrates that Tamworth's housing need should now be considered to be significantly lower than previous evidence suggested, and so there is unlikely to be any unmet need arising in Tamworth over your proposed plan period. In light of this most recent evidence, the Council does not consider it necessary for LDC to specify an amount of housing to be delivered to meet Tamworth's needs at this time. However, the Council wish to make it clear that, on the basis of this evidence, it will not accept meeting Tamworth's housing need as an argument to support development on or in close proximity to the Tamworth border.	<p>Comments noted. Policies and explanatory text relating to housing delivery and Appendix A of the preferred options document make clear role of existing allocations in delivering the housing requirements of the Local Plan Review.</p> <p>Comments noted in regard of Tamworth's decreasing housing need. Housing allocations within the preferred options document are to meet the housing requirement set out within the document.</p>

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LPRPO1162	Tamworth Borough Council	Policy SHA2: Strategic housing allocation land west of Fazeley	Currently not enough detail on the allocation to be content that the infrastructure requirements for an allocation of this size will be fully met within the development and that any development has the potential to have a significant impact on infrastructure within Tamworth borough. The Council therefore considers it appropriate to object to the allocation of the site until sufficient information is available to be able to adequately assess the potential impacts of development at the site on Tamworth. Wish to engage in the development of an Infrastructure Delivery Plan to ensure that any impacts are fully mitigated through the provision of s106 and/or CIL contributions to be made towards affected infrastructure within Tamworth borough.	Comment noted. Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO1163	Tamworth Borough Council	Policy ONR1: Green Belt	Concerned that a full assessment of the housing allocation at Fazeley has not been made and considers this should be done before the plan moves forward. Parcel FZ9 has been identified in policy ONR1 and inset 11 as an area of development restraint to be removed from the Green Belt. This appears to be for the purposes of reserving the site for future development, the need for which is questionable at this point in time. It is considered that a decision on the removal of this area of land from the Green Belt should be deferred until a later plan review when it can be established whether it is required to meet an identified need.	Comments noted. The Green Belt Review provides a comprehensive strategic assessment of all parts of the green belt.
LPRPO1164	Tamworth Borough Council	Policy NS1: New Settlement	Concerns about the lack of detailed information relating to the proposed settlement at such a late stage in the plan making process, unclear at this stage what housing need the proposed new settlement would be seeking to meet, and the lack of information on potential locations for the settlement leads the Council to have concerns that a development of this magnitude has the potential to adversely affect infrastructure in Tamworth, consider premature. If policy included seek to work with LDC through Duty to Cooperate on the development of the potential new settlement.	Comments noted.
LPRPO1165	Tamworth Borough Council	Whole document	Inset 21 North of Tamworth requests that the map be updated to clearly show the boundary between Tamworth and Lichfield.	Comments noted. Policies maps will be updated to accompany submission document.
LPRPO1166	Lichfield Civic Society	Whole document	Society considers that if the regulation 19 version of the Local Plan includes Policy OHF1 (Housing provision) it would be unsound it would be undeliverable over the plan period. Restrictions over private sector housing delivery rates. Local plan evidence fails to acknowledge that private sector housing demand is price sensitive. The review of the plan ins principally occurring to give effect to the allocations DPD Local Plan Review policy to address the unmet housing need arising from the GBBCHMA. The society accepts the Districts own need is deliverable because the standard method incorporates ONS projections for household growth and population growth. This reflects expected levels of inward migration. Society disputes the deliverability of the additional element of the housing target to assist in meeting the unmet needs arising from the GBBCHMA. Base this on analysis from 4 recent reports which demonstrate the scale of the challenge of boosting housing deliveries, in circumstances where private sector housing delivery rates are demand limited, additional land allocations will fail to boost housing delivery.	Comments noted. Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review. The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period.
LPRPO1167	Joan Sandford	Policy SHA2: Strategic housing allocation land west of Fazeley	Objects to the development of 800 dwellings land west of Fazeley as the amount of traffic on the section of the A453 Sutton Road has substantially increased to the extent that it is often difficult for resident to access it from their drive. At certain times of day there are lengthy queues in both directions, preventing free flow of vehicles and with increased levels of pollution from exhaust fumes. The area marked for development has always been Green Belt and it should remain so and protected for the future.	Comments noted. Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO1168	Jayne Ransford	Whole Document	I hold strong objections to the removal of the Green Belt designation of land off Coulter Lane and replacing it with housing. Doing so would risk putting a strain on local services, endangering the local habitat, disrupting local wildlife and impacting negatively on the health outcomes and general wellbeing of existing residents. Consequently this will have a negative impact on the local economy as a whole as well as change the character of the area at large. It must be noted it is the character of the area that has attracted both residents and businesses to the area and thus must be protected. Sincerely hope land is removed from plans and kept to being a beautiful area.	Comments noted. The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.

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LPRPO1169	David Biggs (Tamworth and District Civic Society)	Whole Document	<p>Two key issues for the society: SHA2 Allocation -</p> <ul style="list-style-type: none"> • unsustainable in terms of the existing road infrastructure and other services, and the existing usage and demands • The burden and impact of such additional housing and increased population on the adjoining Borough of Tamworth, whilst all Council Tax income will go to Lichfield District. Suggest therefore that it is in the interests of Lichfield District Council to seek to place its housing allocation/target in places of more relevance and need to Lichfield. • the ecological and environmental damage from the loss of green belt for housing should not be supported. • Concerns regarding the impact on the local heritage, which LDC want to improve and enhance, this scheme seems as odds. • This proposal would clearly destroy the “rural character” of Mile Oak • We see no links in this proposal to the NPPF and Government’s moves to “Building Better, Building Beautiful” or to community support for development. There is no community support for development of this scale and nature. <p>General Issues: • Existing and proposed developments within Lichfield District Council administrative area in the Civil Parish of Wigginton at Wigginton and Coton, at Arkall Farm in Ashby Road and at land north of Browns Lane are removing any visual and green-belt boundary between those areas and the Borough of Tamworth, and also placing all service and infrastructure impact and pressure upon the Borough of Tamworth as the nearest major settlement.</p>	Comments noted. Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO1170	Andrea Simpson	Whole document	<p>Page 26 'Key Issues for our District' - item 2 omits any reference to specialist housing for people with learning disabilities. Sadly lacking in Lichfield, those with learning disabilities moving out of family homes into supported living often do not have sufficient choice of housing to meet their needs, having to move outside of the community they have previously lived. May be something that required liaison with County Council to resolve.</p> <p>Page 58 - Provision for self-build homes - Register apparently shows little demand, but is it publicised and potential self builders aware of the register. Self building should be encouraged and would like to see some provision for this so they don't have to try and find it themselves.</p> <p>Page 64 - Policy OEET1 states that “Opportunities for new business formations will be actively pursued”. Statement needs to have sustainable added in. Lichfield relies heavily on retail, but endless consumption has to stop for the sake of the plane.t</p>	Comments noted. Preferred options document includes policy relating to housing mix which provides support for homes to meet housing requirements and specialist needs.
LPRPO1171	Lichfield Civic Society	Chapter 5: Profile of the District	<p>Suggested additions to paragraph 5.28 indicated as additions in [RED].</p> <p>paragraph 5.28 - "Tourism is a significant part of the local economy particularly based on the heritage, character and environment of the area, with Lichfield city being a particular focal point. There are a number of important attractions within the district, including Lichfield Cathedral Chasewater Country Park, Drayton Manor Theme Park and the National memorial Arboretum. The tourism sector within the district is forecast to grow and the local plan will need to be mindful if this"</p>	Comments noted. Consider addition text as suggested.
LPRPO1172	Lichfield Civic Society	Policy OSS1: Presumption in Favour of Sustainable Development	<p>Policy supported in principle. However, in cases where services, facilities or infrastructure are not available to support the proposed development, or where the necessary provision of these elements is not formally committed through binding legal agreements to become available by the time of occupation, the development should not be approved as it fails to achieve an acceptable level of sustainability.</p>	Comments noted. The preferred options includes policies relating to the range of infrastructure requirements to enable the Council to seek appropriate infrastructure.
LPRPO1173	Lichfield Civic Society	Policy OSS2: Our spatial strategy	<p>Value of including an explicit statement of the spatial strategy including settlement hierarchy is to be welcomed. However there are a number of concerns to the society over the detailed content, which the society wish to be resolved;</p> <p>(i) In view of the failure to achieve the delivery of housing numbers at the rates proposed previously, is it realistic to continue this approach by proposing the numbers now being suggested? (ii) is it appropriate in a district made up largely of open countryside, Green belt, small and medium sized villages, small cathedral city and small town to promote growth as the primary ambition of the Local Plan. (iii) the list of proposals for strategic allocations should also include the settlements of Burntwood, Alrewas and Armitage with Handsacre as they are classified as level 2 and 3 settlements. (iv) Areas of development restraint are not clearly identifiable and the precise location and extent of each should be defined. However, if the council maintains its intention to plan for a new settlement there should be no need to include these proposals. (v) policy refers to the appropriate transport infrastructure provision and the priority to be given to non-car modes in development proposals. Prior or parallel delivery of these is paramount. (vi) there is a conflict or tension between the policy's support for new retail development in Lichfield City Centre and support for the high quality built environment. Concerned that greater weight is given in the policy to growth and further development within the city centre than to enhancing and protecting the unique heritage asset of the city centre. (vii) Support proposal for an urban extension to the north of the city in preference from rolling back further areas of Green Belt to the south and south west. Supports the proposed strategic housing allocations at Fradley, Fazeley and Whittington. However it is suggested that additional allocations should be made at further settlements in order to assist them achieving greater sustainability (Viii) if the new settlement is pursued then it should be included within the settlement hierarchy.</p>	<p>Comments noted. Housing requirement is based-upon the Local Housing Need and contribution toward unmet need. A Housing and Economic Development Needs Assessment has been prepared as part of the evidence base supporting the Local Plan Review.</p> <p>The previous consultation document suggested the Council consider testing a contribution of between 3,000 and 4,500 homes to meet unmet needs. The preferred options document refines this and suggests a contribution of 4,500 homes could be accommodated and be deliverable within the plan period.</p> <p>Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.</p>

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LPRPO1174	Lichfield Civic Society	Policy NS1: New settlement	<p>Welcomes and supports the concept of a new settlement within the District but not the proposed delay in both the timing and selection of a location and delivery of any proposed dwellings until 2040. Civic Society should be located to the north of Lichfield City and separated from it thereby maintaining and safeguarding the important Green Belt areas which would in turn protect the character of the historic city. The District Council should seek to progress this new settlement approach as a matter of urgency, since it would accommodate most effectively their aspiration for growth whilst protecting and enhancing the environment of the District overall.</p>	Comments noted. The Preferred Options sets out the contribution to be provided to meet the established unmet need within the Greater Birmingham Housing Market Area. The Council has undertaken a Green Belt Review which forms part of the evidence base supporting the local plan. With regards to the new settlement no location is suggested within the document as sufficient evidence is not available to make such a proposal at this stage.
LPRPO1175	Lichfield Civic Society	Chapter 12: Our sustainable transport	<p>Generally welcome the policy objective set out in Section 12. We would however question the Council's ability to realistically move toward them. We assume this is principally aimed at improving public transport. The Council has not previously directly supported bus companies financially, this is the responsibility of Staffordshire County Council. LDC's powers are limited to 'support and encouragement' as set out in the policy.</p> <p>Policy includes the intention to reduce the need to travel. The plans intention to provide for 4500 homes to meet the overspill requirements of Birmingham and the Black Country suggest that journey to work movements will increase unless more employment land is allocated in the local plan to cater for this population. Our confidence in both councils achieving a modal shift is very low. The consequence of what is in effect a 'just carry on as we are' policy will lead to increased traffic congestion on the principal and local highways.</p> <p>In conclusion, the society believes that these policies would require positive and not passive enforcement. In particular it is vitally important to ensure that before any new development is occupied, transport infrastructure and services are subject to legally binding agreements to ensure that the transport infrastructure is in place.</p>	Comments noted. Preferred options document includes policies relating to infrastructure to enable the securing of appropriate infrastructure.
LPRPO1176	Lichfield Civic Society	Policy OHF1: Housing provision	<p>Policy proposed four strategic development allocations, but it is considered there are additional areas for inclusion for allocations such as Burntwood, Alrewas, Armitage with Handsacre and adjoining the west of Bonehill. These allocations would enable some reduction in the scale of excessively large number proposed to the north of Lichfield. The reduction suggested would assist in achieving a more realistic proportion of the total District housing numbers being proposed at present in Lichfield City. The current provision of 6,929 dwellings out of 11,500 is considered to be completely out of balance, as well as unlikely to be achieved due to the sheer scale of development.</p> <p>A reduction in scale of housing provision to the north of Lichfield of 800 to 2,500 would be more appropriate and more likely to be delivered.</p>	Comments noted. Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO1177	Lichfield Civic Society	Policy OHF2: Providing a balanced housing market and optimising housing density	<p>The Civic Society support the principle of seeking provision of a balanced range of housing. Because of the age of the structure of the population of the District, and the ageing of the population which is forecast during the Plan period increasing the proportion of elderly and very elderly overall, it will be vital to ensure the policy explicitly incorporates appropriate provision for this group in terms of type, size and location of accommodation.</p> <p>In relation to the proposed approach to density, the Civic Society have a proviso relating to the proposal for "higher densities" in Lichfield City of 50 dwellings per hectare. The safeguard included in the paragraph needs to be strengthened to ensure the historic character and heritage assets of the City Centre are neither eroded nor harmed by over-intensive and inappropriate development densities, with lower densities required in order to safeguard and enhance the area.</p>	Comments noted.
LPRPO1178	Lichfield Civic Society	Policy OHF3: Affordable housing	The Civic Society support the Policy, and would wish to see it delivered.	Support noted.
LPRPO1179	Lichfield Civic Society	Policy OEET1: Our employment and economic development	<p>Allocations of B1 uses alongside B2 and B8 on new sites such as Cricket Lane, Lichfield where there is a major residential allocation is questionable. Potential office users may not wish to be alongside the other uses and there are likely to be problems for nearby residential occupiers. We suggest that the change highlighted in [RED] in the paragraph below be made:</p> <p>Strategic Policy OEET1 para. 5 - "Development proposals outside of the traditional use classes (B1, B2 and B8) will normally not be supported unless it can be demonstrated that the proposed use would enhance or complement the existing employment offer and is demonstrated that any proposed use falling outside of the B1/B2/B8 use classes would not detrimentally affect an employment or residential area".</p>	Comments noted.
LPRPO1180	Lichfield Civic Society	Policy OEET2: Our centres	We generally welcome the policy intentions set out in Policy OEET2. We are however concerned over the view that proposals for retail and leisure uses on employment land will be permitted subject to meeting certain conditions. We believe that the primary test is whether the use could be satisfactorily accommodated in the principal shopping centres (i.e. Lichfield and Burntwood). There should be a presumption AGAINST allowing retail and leisure development other than in recognised centres UNLESS the applicant can prove that there are no satisfactory sites in the acknowledged centres. At a time when retailing is undergoing change, we believe it is the role of the Council to support recognised shopping centres and engender their transformation into retail and leisure hubs, not propose a policy which includes a presumption in favour out of centre locations.	Comments noted. Consideration of policy wording alongside evidence.
LPRPO1181	Lichfield Civic Society	Policy OEET4: Tourism	We generally welcome the tourism policies. There are references to developments related to existing tourism policies being permitted providing that they are consistent with other local plan policies. We suggest a stronger policy should be inserted in the local plan to protect and facilitate expansion of the National Memorial Arboretum by requiring development proposals on adjoining areas of land to demonstrate that they will not inhibit future expansion of the site.	Support noted.

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			<p>Policy intentions are to be welcomed. These aim to protect and improve the built environment and ensure that new development makes a positive contribution to the local distinctiveness. There are also strong policies to protect the assets in the Conservation Areas. Sadly those good intentions are not borne out in practice. Evidence can be found in the new development that has recently occurred in the city centre (Premier Inn, McCarthy & Stone). Therefore the society strongly supports the policy but believes it will not be achieved unless the Council resolves to take a positive approach in rejecting inappropriate development.</p>	
LPRPO1182	Lichfield Civic Society	Policy OBHE1: Historic environment	<p>The society is pleased that in response to its previous representations there is significant strengthening of the policies relating to the historic environment, protection of heritage assets, conservation area policies.</p>	Support noted.
LPRPO1183	Lichfield Civic Society	Policy OBHE2: Loss of heritage assets	<p>Suggested addition to Strategic Policy OBHE2: Loss of heritage assets are indicated as additions in [RED].</p> <p>Strategic Policy OBHE2 para. 2 - "Clear and convincing evidence will be required to justify any harm to or loss of the significance of a heritage asset or its setting."</p>	Comments noted. Consideration will be given to the policy wording in light of representations.
LPRPO1184	Lichfield Civic Society	Vision for Lichfield	<p>The Civic Society is concerned at the excessive scale of housing proposed for Lichfield, as referred to in the Vision, which is considered out of proportion to the District total, as explained elsewhere in this response (Section 13 Housing). The number of dwellings proposed for north of Lichfield should be reduced by 800 to 2,500 and re-distributed elsewhere (refer paragraphs 19 to 23 above), our response to Housing Provision (Strategic Policy OHF1), in order to redress this imbalance and make delivery more certain.</p>	Comments noted. Preferred options document includes four strategic development allocations and further allocated housing requirements to settlements within the settlement hierarchy. Locations identified for growth and the associated supporting evidence will be considered as the Local Plan progresses and the additional evidence work is completed.
LPRPO1185	Lichfield Civic Society	Policy SHA1: Strategic housing north of Lichfield	<p>Scale of proposed allocation is too large. Support the proposal for requiring a masterplan to be prepared for the development.</p> <p>The list of infrastructure is noted. Civic society have some concerns about the timing of infrastructure provision in relation to the implementation of the housing development. Policy should state clearly that development will only proceed following the provision of necessary infrastructure or that no occupation can take place until the necessary infrastructure is complete.</p>	Comments noted. Policy SHA1 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.
LPRPO1186	Lichfield Civic Society	Policy LC1: Lichfield economy	<p>The Civic Society welcomes the statement supporting "sustaining and enhancing the significance of its historic environment and heritage assets and their setting" in developing the economy, but has concerns at some of the growth proposals, and would seek a balance in decisions which safeguards the unique heritage above all other issues. one example of concern is the quantity and scale of office space proposed at 1,000m²-1,400m² per year, which over the Plan period will accumulate to become an extremely large amount of development, incapable if being integrated successfully into the City Centre in an environmentally satisfactory manner.</p>	Comments noted. Office requirements based upon evidence which supports the local plan review.
LPRPO1187	Lichfield Civic Society	Policy LC2: Lichfield environment	<p>The Civic Society support the general approach and Policy. The only concern relates to the recent deletion of policies protecting the open space network within the City and within the City Centre, particularly the Framework Open Space policy. The Society wish this policy to be re-introduced in a generally similar format to ensure important open space areas, particularly those within and adjoining the City Centre and in Conservation Areas, are given complete protection and are not gradually lost or eroded. if reintroduction is not to be done, then we consider that Policy LC2 should include express reference to the protection of Open space and recreation (preferred Policy OSR2) as being particularly relevant to the City centre.</p>	Comments noted. Preferred options includes policies which provide protection to open spaces.
LPRPO1188	Lichfield Civic Society	Policy LC3: Lichfield services and facilities	<p>Concern of the Society that within the section there is no reference to action to tackle issues and shortfalls in services and facilities provision in the City, for instance, health provision and secondary school provision.</p> <p>One example is health care provision, The need for improvements to provision including accommodation, capacity and supporting facilities including car parking should feature in the Local Plan. Additionally the very high rates of car usage that already exist in the City and the lack of ongoing success in achieving increased usage of non-car modes is not addressed directly. With a significant increase in the number of dwellings to the north of Lichfield, without the guaranteed provision of good quality bus services and direct footpath and cycle way links to the city centre. This will have a detrimental effect on the historic centre.</p> <p>An area of concern is the piecemeal approach to car parking in the City Centre. it has been the long held view of the Civic Society that a Car Parking Strategy is needed for the city centre.</p>	Comments noted.
LPRPO1189	Lichfield Civic Society	Appendix B - Masterplan guidelines	<p>The guide to areas to be covered in the masterplan listed in paragraph B.1 should also include: How the scheme will address local infrastructure needs arising from the development and mitigating existing deficiencies in community or social infrastructure; Provision of fibre broadband access to all properties; Measures proposed to minimise the water use and recycling of water.</p>	Comments noted.
LPRPO1190	Lichfield Civic Society	Glossary & abbreviations	<p>Should include definitions of Listed buildings and blue and green infrastructure.</p>	Comments noted. Add to glossary

Representation Reference	Consultee/Agent	Chapter/Policy/item	Comment Summary	Officer Response
LPRPO1191	Roger Chance	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>This development will see a significant increase in the number of residential dwellings, cars and increased overall population of the local areas is excessive.</p> <p>Traffic on the A453 at the moment is very busy because of developments within the local area, which would only be exacerbated by this proposal.</p> <p>Visitors to Drayton Manor Park in the summer and Bank Holidays already causes severe traffic congestion between Mile Oak and Fazeley and Fazeley town centre becomes grid locked. There are inadequate amenities of Doctors Dentists and Schools to service an influx of population.</p> <p>Green Belt land should be protected.</p> <p>Concerns regarding pollution and climate change</p> <p>HS2 is to be implemented less than a mile away which will cause further disruption.</p>	<p>Comments noted. Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.</p>
LPRPO1192	Thomas Houlcroft	Policy ONR1: Green Belt	<p>Loss of Green Belt notably in the village of Hammerwich , should be protected to prevent Chase Terrace , Chase Town , Burntwood and Hammerwich becoming one large conurbation with no defining boundary lines</p>	<p>Comments noted. The Preferred Options document does not propose the development being referred to. The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.</p>
LPRPO1193	Elaine Willett	Policy ONR1: Green Belt	<p>Strongly object to the proposal by a Developer for Green Belt land in Hammerwich/Burntwood to be changed to enable the building of 1300 homes. The loss of our Green Belt would result in urban sprawl which is not acceptable. This land acts as a buffer and keeps the identity of Hammerwich as a village.</p>	<p>Comments noted. The Preferred Options document does not propose the development being referred to. The Preferred Options document does not propose any new homes within the Green Belt at Burntwood. The plan proposes for 400 homes to be built within the urban area, to be identified by the neighbourhood plan or future local plan documents.</p>
LPRPO1194	K and E Day	Whole document	<p>Suggest no further housing along the A38 as the road is already over used and if blocked by accidents, the villages are also blocked. More housing would mean more pressure on the A 38. Infrastructure for further housing does not exist. Why cannot brownfield sites be used.</p> <p>in the above plan there are concerns about the proposal to remove land off</p>	<p>New housing could facilitate improvements to the A38 to reduce the risk of accidents and infrastructure improvements would be required to facilitate the new housing proposed. Strategy has prioritised use of brownfield sites where possible.</p>
LPRPO1195	Janet Dawson	Policy ONR1: Green Belt	<p>Coulter Lane from the green belt.</p> <p>The access roads are not suitable for heavy plant required to develop the land and the subsequent increase in traffic from new homes would make Church Road and Farewell Lane even busier than at present.</p> <p>The land at Mount Road also should be redeveloped into housing so that the industrial units can be better located on the Burntwood bypass.</p> <p>Welcome Preferred Policy: New Settlement, if this policy was to be implemented it could avoid any further erosion of the Green Belt surrounding Burntwood.</p>	<p>Comments noted. The document identifies areas of 'Safeguarded Land' as defined within national policy. National policy states that consideration should be given that where changes to the Green Belt boundary are being proposed then areas of land between the urban area and the Green Belt (Safeguarded Land) should be identified to ensure the Green Belt boundary is capable of enduring beyond the plan period. The preferred options document identifies areas of such safeguarded land in conformity with national planning policy.</p>
LPRPO1196	N Elverson	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>Will have negative impact on Tamworth resources and council tax will go to Lichfield. A453 and A5 have existing traffic congestion with another housing estate already under construction, and Ventura park the roads will struggle to cope.</p>	<p>Comments noted. Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.</p>
LPRPO1197	David Richards	PolicySHA2: Strategic housing allocation land west of Fazeley	<p>Recognises the need for LDC to build more homes, however does not think Land as Mile Oak should be considered as suitable location for the following reasons:</p> <p>Land was designated as Green Belt for good reasons to prevent urban sprawl.</p> <p>Building 800 homes will impose additional strain on local services already under strain causing a detrimental impact on the lives of everyone presently living in the area.</p> <p>Traffic generated at this location would add considerably to congestion in the area. A453 and B5054 are already very busy and residents of neighbouring roads find it difficult to exit these roads by vehicle. Already considerable queues of traffic at Mile Oak cross roads.</p> <p>Added to Dunstall Lane development of 400 homes and heavy goods vehicles from warehouses off Bonehill Road, this development is wholly inappropriate leading to more congestion, misery and overloading of local services.</p>	<p>Comments noted. Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.</p>
LPRPO1198	Geraldine Ricahrs	Policy SHA2: Strategic housing allocation land west of Fazeley	<p>Understand the need for LDC to build more new homes I feel that using Green Belt Land is not the way forward. Land was always designated Green Belt for very good reasons, mainly to prevent urban sprawl</p> <p>Not only would 800 homes mean the loss of Green Belt but the inevitable strain on local services and would have a detrimental impact on the lives of existing residents</p>	<p>Comments noted. Policy SHA2 includes requirement for appropriate infrastructure as part of development of site. Infrastructure requirements based on current evidence, further evidence in process of collection and will continue to inform the emerging Local Plan Review. Levels of growth set out within the plan relate to the overall spatial strategy.</p>

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LPRPO1199	K Fenwick (Pegasus Group) for Smith Brothers Farms Ltd	Whole document	<p>The Preferred Options document is supported by a Sustainability Assessment (SA). Overall, this document needs to be provide further narrative to explain how the spatial strategy and associated allocations were selected over other reasonable alternatives. It is set out at Section 2.4 that the spatial strategy reflects a combination of Residential Growth Options 2 and 4 and Employment Growth Option 1 but there is no clear narrative explaining how the selections were made and how this represents a balanced, sustainable strategy. There is also no explanation of how the 4,500 dwellings contribution towards the GBBCHMA shortfall has been determined.</p> <p>Paragraph 2.6.3 confirms that no employment sites are identified at the Local Plan Review: Preferred Option and therefore there no assessment of alternative employment sites was undertaken. It is not clear why no employment sites have been identified and effectively results in the implementation of the 'do nothing' approach to employment. This should be justified in the SA.</p>	Comments noted.

Representation Reference	Consultee/Agent	Section	Comment Summary	Officer Response
SA1	Ben Cook (Pegasus) on behalf of Wilson Bowden	Overall SA	<p>Document needs to provide further narrative to explain how the spatial strategy and associated allocations were selected over other reasonable alternatives. It is set out at Section 2.4 that the spatial strategy reflects a combination of Residential Growth Options 2 and 4 and Employment Growth Option 1 but there is no clear narrative explaining how the selections were made and how this represents a balanced, sustainable strategy.</p> <p>There is also no explanation of how the 4,500 dwellings contribution towards the GBBCHMA shortfall has been determined, needs to be addressed.</p> <p>The SA discusses the site selection methodology for residential sites which has led to the identification of four strategic allocations. As discussed in the main representation to the Plan, we consider that a number of changes are needed to enable a sustainable balanced strategy to be delivered, and thereby for the SA to be justified. It also noted that sites that are not deemed to be strategic in nature are excluded from the assessment. However, the cumulative impact of nonstrategic sites can contribute towards a sustainable, balanced strategy and therefore does form a reasonable alternative which should be included and considered by the SA.</p> <p>When assessing the long-term effects, the assumption was made that mitigation measures have been proposed that these have been applied. What are the mitigation measures are and who has proposed them? Section 3.1 sets out the context and objectives which have informed the Plan and the SA. The key national plans, policies and programmes fails to make reference to the government policies regarding delivery of homes, with the NPPF reiterating the Government's objective of significantly boosting the supply of homes (Paragraph 59). This is key consideration in the drafting of the Plan and the accompanying SA and should be included.</p>	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.
SA2	Highways England	Overall SA	No detailed comments. However at such time as individual planning applications are submitted it will be necessary to ensure compliance with the Design Manual for Roads and Bridges (DMRB) and DfT Circular 02/2013.	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.
SA3	Liz Boden Pegasus for Drayton Manor Park	Overall SA	Document needs to provide further narrative to explain how the spatial strategy and associated allocations were selected over other reasonable alternatives and this should also be expanded to relate to the employment strategy. The SA assess that two significant positive effects are expected for SA Objective 6: Achieving Stable and Sustainable economic growth, i.e. to support sustainable economic growth and improve employment opportunities in the District, including tourism and development of Drayton Manor Park together with SA objective 5: improving education attainment. DMP concur with this view. However, it is considered that DMP should be included within the Local Plan Review as an allocated employment site and should be assessed by the SA as part of that process.	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.
SA4	Ben Cook (Pegasus) on behalf of Cooper Developments LPRPO411	Whole Document Sustainability Appraisal	<p>SA document needs to provide further narrative to explain how the spatial strategy and associated allocations were selected over reasonable alternatives. It set out at Section 2.4 that the spatial strategy reflects a combination of Residential Growth Options 2 and 4 and Employment Growth Option 1, but no clear narrative explaining how selections were made. There is also no explanation of how 4,500 dwellings contribution towards the GBBCHMA shortfall has been determined.</p> <p>Paragraph 2.6.3 confirms no employment sites are identified at the Preferred Options stage, it is unclear why this is and effectively results in the implementation of the 'do nothing' approach to employment. This should be justified in the SA.</p> <p>It is noted that sites that are not deemed to be strategic in nature are excluded from the assessment. However, the cumulative impact of non-strategic sites can contribute towards a sustainable, balanced strategy and therefore does form a reasonable alternative which should be included and considered by the SA.</p> <p>When assessing the long-term effects in Section 2.8, the assumption was made that mitigation measures have been proposed that these have been applied. Helpful if this section clarified what the mitigation measures are and who has proposed them.</p> <p>The key national plans, policies and programmes fails to make reference to the government policies regarding delivery of homes, with the NPPF reiterating the Government's objective of significantly boosting the supply of homes (Paragraph 59). This is key consideration in the drafting of the Plan and the accompanying SA and should be included.</p> <p>Strategic allocation of 5,535 dwellings is supported overall, but this needs to be as part of a balanced strategy. Proposed allocations are focused on Lichfield and other larger service village; Fradley, Fazeley and Whittington, this does not represent a balanced strategy or align with Policy OSS2.</p>	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.
SA5	Darren Bell (David Lock Associates) on behalf of Tarmac	Whole Document Sustainability Appraisal	Representation relates to the sustainability appraisal. Object to the Sustainability Appraisal as the site promoted by Tarmac has been incorrectly assessed. Have undertaken reassessment using the criteria within the Councils SA. Consider given this assessment the Alrewas Quarry proposal should be reviewed and considered for allocation ahead of the next local plan consultation. The reassessment shows that Alrewas Quarry performs well against the selection criteria and the inclusion of the site for housing and mixed-use development would be justified.	Comments noted. Further evidence is being collected and will inform the judgments as the plan progresses.
SA6	K Fenwick (Pegasus) on behalf of Smith Brothers Farms	Whole Document Sustainability Appraisal	<p>The Preferred Options document is supported by a Sustainability Assessment (SA). Overall, this document needs to provide further narrative to explain how the spatial strategy and associated allocations were selected over other reasonable alternatives. It is set out at Section 2.4 that the spatial strategy reflects a combination of Residential Growth Options 2 and 4 and Employment Growth Option 1 but there is no clear narrative explaining how the selections were made and how this represents a balanced, sustainable strategy. There is also no explanation of how the 4,500 dwellings contribution towards the GBBCHMA shortfall has been determined.</p> <p>Paragraph 2.6.3 confirms that no employment sites are identified at the Local Plan Review: Preferred Option and therefore there no assessment of alternative employment sites was undertaken. It is not clear why no employment sites have been identified and effectively results in the implementation of the 'do nothing' approach to employment. This should be justified in the SA.</p>	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.

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SA7	Neil Cox (Pegasus Group) on behalf of Bloor Homes LRPPO676	Whole Document Sustainability Appraisal	<p>SA document needs to provide further narrative to explain how the spatial strategy and associated allocations were selected over reasonable alternatives. It set out at Section 2.4 that the spatial strategy reflects a combination of Residential Growth Options 2 and 4 and Employment Growth Option 1, but no clear narrative explaining how selections were made. There is also no explanation of how 4,500 dwellings contribution towards the GBBCHMA shortfall has been determined.</p> <p>Paragraph 2.6.3 confirms no employment sites are identified at the Preferred Options stage, it is unclear why this is and effectively results in the implementation of the 'do nothing' approach to employment. This should be justified in the SA.</p> <p>It is noted that sites that are not deemed to be strategic in nature are excluded from the assessment. However, the cumulative impact of non-strategic sites can contribute towards a sustainable, balanced strategy and therefore does form a reasonable alternative which should be included and considered by the SA.</p> <p>When assessing the long-term effects in Section 2.8, the assumption was made that mitigation measures have been proposed that these have been applied. Helpful if this section clarified what the mitigation measures are and who has proposed them.</p> <p>The key national plans, policies and programmes fails to make reference to the government policies regarding delivery of homes, with the NPPF reiterating the Government's objective of significantly boosting the supply of homes (Paragraph 59). This is key consideration in the drafting of the Plan and the accompanying SA and should be included.</p> <p>Section 4 needs to clearly justify how the preferred spatial option has been arrived at having regard to all 'reasonable' alternatives. It should also justify how the 4,500 dwelling contribution towards the GBBCHMA has been derived. The identification of new strategic allocations is supported however this needs to form part of a balanced strategy. The proposed allocations are focused on Lichfield and other larger service villages: Fradley; Fazeley; and, Whittington. The inclusion of allocations at four settlements does not represent a balanced strategy. This does not align with Strategic Policy OSS2 (as set out at paragraph 2.4.7) which states new growth/development will be directed to the most sustainable locations via a hierarchy of centres and settlements. The proposal to allocate sites in four settlements does not align with this aim.</p>	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.
SA8	D Oakley (RPS) for Fradley Consortium	Sustainability Appraisal	<p>The SA flawed as not considered alternative site boundaries or capacities in relation to other sites at Fradley, in particular the Fradley Junction site, as 'reasonable alternatives' to the preference for grouping sites. Not clear what the reasoning behind the preferred options now presented is, especially as alternative options at Fradley include part brownfield land.</p> <p>Needs to be consultation as the public should have an effective opportunity to comment on appraisal of alternatives. Detailed critique of the assessment of Land at Fradley junction submitted and ability to deliver submitted.</p>	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.
SA9	I Deverell (Turley) for Redrow	Sustainability Appraisal	<p>Does not provide any conclusions as to the suitability of given sites for allocation, nor does it provide any consideration of why reasonable alternative were selected or rejected. Striking uniformity in the assessment and scoring of the four preferred options despite the significant differences in their respective social, economic and environmental constraints. The strategic allocations are out-performed by alternatives within the SA and without the specific reasons for selection.</p>	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.
SA10	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd		<p>Document needs to provide further narrative to explain how the spatial strategy and associated allocations were selected over other reasonable alternatives. It is set out at Section 2.4 that the spatial strategy reflects a combination of Residential Growth Options 2 and 4 and Employment Growth Option 1 but there is no clear narrative explaining how the selections were made and how this represents a balanced, sustainable strategy.</p> <p>There is also no explanation of how the 4,500 dwellings contribution towards the GBBCHMA shortfall has been determined, needs to be addressed.</p> <p>The SA discusses the site selection methodology for residential sites which has led to the identification of four strategic allocations. As discussed in the main representation to the Plan, we consider that a number of changes are needed to enable a sustainable balanced strategy to be delivered, and thereby for the SA to be justified. It also noted that sites that are not deemed to be strategic in nature are excluded from the assessment. However, the cumulative impact of nonstrategic sites can contribute towards a sustainable, balanced strategy and therefore does form a reasonable alternative which should be included and considered by the SA.</p> <p>When assessing the long-term effects, the assumption was made that mitigation measures have been proposed that these have been applied. What are the mitigation measures are and who has proposed them?</p> <p>Section 3.1 sets out the context and objectives which have informed the Plan and the SA. The key national plans, policies and programmes fails to make reference to the government policies regarding delivery of homes, with the NPPF reiterating the Government's objective of significantly boosting the supply of homes (Paragraph 59). This is key consideration in the drafting of the Plan and the accompanying SA and should be included.</p>	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.

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SA11	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd		<p>Document needs to provide further narrative to explain how the spatial strategy and associated allocations were selected over other reasonable alternatives. It is set out at Section 2.4 that the spatial strategy reflects a combination of Residential Growth Options 2 and 4 and Employment Growth Option 1 but there is no clear narrative explaining how the selections were made and how this represents a balanced, sustainable strategy.</p> <p>There is also no explanation of how the 4,500 dwellings contribution towards the GBBCHMA shortfall has been determined, needs to be addressed.</p> <p>The SA discusses the site selection methodology for residential sites which has led to the identification of four strategic allocations. As discussed in the main representation to the Plan, we consider that a number of changes are needed to enable a sustainable balanced strategy to be delivered, and thereby for the SA to be justified. It also noted that sites that are not deemed to be strategic in nature are excluded from the assessment. However, the cumulative impact of nonstrategic sites can contribute towards a sustainable, balanced strategy and therefore does form a reasonable alternative which should be included and considered by the SA.</p> <p>When assessing the long-term effects, the assumption was made that mitigation measures have been proposed that these have been applied. What are the mitigation measures are and who has proposed them?</p> <p>Section 3.1 sets out the context and objectives which have informed the Plan and the SA. The key national plans, policies and programmes fails to make reference to the government policies regarding delivery of homes, with the NPPF reiterating the Government's objective of significantly boosting the supply of homes (Paragraph 59). This is key consideration in the drafting of the Plan and the accompanying SA and should be included.</p>	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.
SA12	K Ventham (Barton Willmore) for Curborough North	Sustainability Appraisal	<p>Barton Willmore has undertaken a compliance review of the SA and has set out where areas can be strengthened to ensure the SA complies with the relevant legislation- Existing environment (HRA), environmental protection objectives, reasonable alternatives, monitoring, non-technical summary (details provided). Revised score for the site is suggested.</p>	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.
SA13	David Pickford (Pegasus) on behalf of Daniel Wright	Sustainability Appraisal	<p>SA document needs to provide further narrative to explain how the spatial strategy and associated allocations were selected over reasonable alternatives. It set out at Section 2.4 that the spatial strategy reflects a combination of Residential Growth Options 2 and 4 and Employment Growth Option 1, but no clear narrative explaining how selections were made. There is also no explanation of how 4,500 dwellings contribution towards the GBBCHMA shortfall has been determined.</p> <p>Paragraph 2.6.3 confirms no employment sites are identified at the Preferred Options stage, it is unclear why this is and effectively results in the implementation of the 'do nothing' approach to employment. This should be justified in the SA.</p> <p>SA discusses the site selection methodology for residential sites, which has led to the identification of four strategic allocations. As discussed above, this does not represent a sustainable balanced strategy, and this is not clearly justified by the SA.</p> <p>It is noted that sites that are not deemed to be strategic in nature are excluded from the assessment. However, the cumulative impact of non-strategic sites can contribute towards a sustainable, balanced strategy and therefore does form a reasonable alternative which should be included and considered by the SA.</p> <p>When assessing the long-term effects in Section 2.8, the assumption was made that mitigation measures have been proposed that these have been applied. Helpful if this section clarified what the mitigation measures are and who has proposed them.</p> <p>The key national plans, policies and programmes fails to make reference to the government policies regarding delivery of homes, with the NPPF reiterating the Government's objective of significantly boosting the supply of homes (Paragraph 59). This is key consideration in the drafting of the Plan and the accompanying SA and should be included.</p> <p>Section 4 needs to clearly justify how the preferred spatial option has been arrived at having regard to all 'reasonable' alternatives. It should also justify how the 4,500 dwelling contribution towards the GBBCHMA has been derived. The identification of new strategic allocations is supported however this needs to form part of a balanced strategy. The proposed allocations are focused on Lichfield and other larger service villages: Fradley; Fazeley; and, Whittington. The inclusion of allocations at four settlements does not represent a balanced strategy. This does not align with Strategic Policy OSS2 (as set out at paragraph 2.4.7) which states new growth/development will be directed to the most sustainable locations via a hierarchy of centres and settlements. The proposal to allocate sites in four settlements does not align with this aim.</p>	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.
SA14	K Ventham (Barton Willmore) for Curborough North	Sustainability Appraisal	<p>Barton Willmore has undertaken a compliance review of the SA and has set out where areas can be strengthened to ensure the SA complies with the relevant legislation- Existing environment (HRA), environmental protection objectives, reasonable alternatives, monitoring, non-technical summary (details provided). Revised score for the site is suggested.</p>	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.

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SA15	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Sustainability Appraisal	<p>The Preferred Options document is supported by a Sustainability Assessment (SA). Overall, this document needs to be provide further narrative to explain how the spatial strategy and associated allocations were selected over other reasonable alternatives. No assessment of alternative employment sites was undertaken. It is not clear why no employment sites have been identified and effectively results in the implementation of the 'do nothing' approach to employment. This should be justified in the SA.</p> <p>The SA discusses the site selection methodology for residential sites which has led to the identification of four strategic allocations. As discussed in the mainrepresentation to the Plan, this does not represent a sustainable balanced strategy, and this is not clearly justified by the SA. It also noted that sites that are not deemed to be strategic in nature are excluded from the assessment. However, the cumulative impact of non-strategic sites can contribute towards a sustainable, balanced strategy and therefore does form a reasonable alternative which should be included and considered by the SA.</p>	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.
SA16	Neil Cox (Pegasus Group) on behalf of Richborough Estates	Sustainability Appraisal	<p>The Preferred Options document is supported by a Sustainability Assessment (SA). Overall, this document needs to be provide further narrative to explain how the spatial strategy and associated allocations were selected over other reasonable alternatives. No assessment of alternative employment sites was undertaken. It is not clear why no employment sites have been identified and effectively results in the implementation of the 'do nothing' approach to employment. This should be justified in the SA.</p> <p>The SA discusses the site selection methodology for residential sites which has led to the identification of four strategic allocations. As discussed in the main representation to the Plan, this does not represent a sustainable balanced strategy, and this is not clearly justified by the SA. It also noted that sites that are not deemed to be strategic in nature are excluded from the assessment. However, the cumulative impact of non-strategic sites can contribute towards a sustainable, balanced strategy and therefore does form a reasonable alternative which should be included and considered by the SA.</p>	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.
SA17	Vistry Homes	Sustainability Appraisal	<p>The SA work prepared by the Council in relation to the identification, selection and assessment of strategic housing delivery options is unsound in that it has failed to provide reasons for the selection or rejection of the reasonable alternatives. It is also clear that the Council has not undertaken an objective assessment of the proposed site allocations, the flaws of which become clear when it is considered that sites such as Land north of Tamworth have not been allocated despite out-performing strategic allocations against some SA Objectives. In addition to being in a highly sustainable location, Vistry Homes are not aware of any environmental constraints that would prevent the site from being developed to provide much needed private and affordable homes.</p>	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.
SA18	Neil Cox (Pegasus Group) on behalf of Richborough Estates		<p>The Preferred Options document is supported by a Sustainability Assessment (SA). Overall, this document needs to be provide further narrative to explain how the spatial strategy and associated allocations were selected over other reasonable alternatives. No assessment of alternative employment sites was undertaken. It is not clear why no employment sites have been identified and effectively results in the implementation of the 'do nothing' approach to employment. This should be justified in the SA.</p> <p>The SA discusses the site selection methodology for residential sites which has led to the identification of four strategic allocations. As discussed in the main representation to the Plan, this does not represent a sustainable balanced strategy, and this is not clearly justified by the SA. It also noted that sites that are not deemed to be strategic in nature are excluded from the assessment. However, the cumulative impact of non-strategic sites can contribute towards a sustainable, balanced strategy and therefore does form a reasonable alternative which should be included and considered by the SA.</p>	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.

Representation Reference	Consultee/Agent	Section	Comment Summary	Officer Response
SA19	Neil Cox (Pegasus Group) on behalf of Richborough Estates		<p>The Preferred Options document is supported by a Sustainability Assessment (SA). Overall, this document needs to be provide further narrative to explain how the spatial strategy and associated allocations were selected over other reasonable alternatives. No assessment of alternative employment sites was undertaken. It is not clear why no employment sites have been identified and effectively results in the implementation of the 'do nothing' approach to employment. This should be justified in the SA.</p> <p>The SA discusses the site selection methodology for residential sites which has led to the identification of four strategic allocations. As discussed in the main representation to the Plan, this does not represent a sustainable balanced strategy, and this is not clearly justified by the SA. It also noted that sites that are not deemed to be strategic in nature are excluded from the assessment.</p> <p>However, the cumulative impact of non-strategic sites can contribute towards a sustainable, balanced strategy and therefore does form a reasonable alternative which should be included and considered by the SA.</p>	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.
SA20	Neil Cox (Pegasus Group) on behalf of Richborough Estates		<p>The Preferred Options document is supported by a Sustainability Assessment (SA). Overall, this document needs to be provide further narrative to explain how the spatial strategy and associated allocations were selected over other reasonable alternatives. No assessment of alternative employment sites was undertaken. It is not clear why no employment sites have been identified and effectively results in the implementation of the 'do nothing' approach to employment. This should be justified in the SA.</p> <p>The SA discusses the site selection methodology for residential sites which has led to the identification of four strategic allocations. As discussed in the main representation to the Plan, this does not represent a sustainable balanced strategy, and this is not clearly justified by the SA. It also noted that sites that are not deemed to be strategic in nature are excluded from the assessment.</p> <p>However, the cumulative impact of non-strategic sites can contribute towards a sustainable, balanced strategy and therefore does form a reasonable alternative which should be included and considered by the SA.</p>	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.
SA21	Neil Cox (Pegasus Group) on behalf of Richborough Estates		<p>The Preferred Options document is supported by a Sustainability Assessment (SA). Overall, this document needs to be provide further narrative to explain how the spatial strategy and associated allocations were selected over other reasonable alternatives. No assessment of alternative employment sites was undertaken. It is not clear why no employment sites have been identified and effectively results in the implementation of the 'do nothing' approach to employment. This should be justified in the SA.</p> <p>The SA discusses the site selection methodology for residential sites which has led to the identification of four strategic allocations. As discussed in the main representation to the Plan, this does not represent a sustainable balanced strategy, and this is not clearly justified by the SA. It also noted that sites that are not deemed to be strategic in nature are excluded from the assessment. However, the cumulative impact of non-strategic sites can contribute towards a sustainable, balanced strategy and therefore does form a reasonable alternative which should be included and considered by the SA.</p>	Comments noted. Consideration will be given as to the need for further narrative. Further evidence is being collected as the plan progresses and will inform the judgments as the plan progresses.

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Representation Reference	Consultee/Agent	Section	Comment Summary	Officer Response
HRA1	Highways England	Overall HRA	No detailed comments. However at such time s individual planning applications are submitted it will be necessary to ensure compliance with the Design Manual for Roads and Bridges (DMRB) and DfT Circular 02/2013.	Comments Noted.

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