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Monday, 29 November 2021

Dear Sir/Madam

## CABINET

A meeting of the Cabinet has been arranged to take place on **TUESDAY, 7TH DECEMBER, 2021 at 6.00 PM IN THE COUNCIL CHAMBER** District Council House, Lichfield to consider the following business.

Access to the Council Chamber is via the Members' Entrance.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Christie Tims'.

Christie Tims  
**Head of Governance and Performance**

**To: Members of Cabinet**

Councillors Pullen (Chairman), Eadie (Vice-Chair), Cox, Lax, Smith, Strachan and A Yeates



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## AGENDA

1. Apologies for Absence
2. Declarations of Interest
3. Money Matters 2021/22: Review of the Financial Performance Against the Financial Strategy 3 - 28
4. Calculation of Business Rates 2022/23, Council Tax Base For 2022/23 and the Projected Collection Funded Surplus / Deficit for 2021/22 29 - 38
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# Money Matters: 2021/22 Review of Financial Performance against the Financial Strategy

Agenda Item 3

Cabinet Member for Finance, Procurement & Revenues and Benefits



Date: 7 December 2021

Agenda Item: 3

Contact Officer: Anthony Thomas

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Email: Anthony.thomas@lichfielddc.gov.uk

Key Decision? YES

Local Ward Full Council

Members

Cabinet

## 1. Executive Summary

- 1.1 The report covers the financial performance from April to September (Quarter Two) for 2021/22 including updated projections of the financial impact of COVID-19.
- 1.2 The Medium Term Financial Strategy projected general reserves at 31 March 2022 would be **£6,985,824**. At this stage, general reserves are forecast to be **£6,913,291**, a reduction of **(£72,533)** related to:
  - A higher than budgeted contribution in 2020/21 of **£139,117**
  - Approved updates in 2021/22 summarised in para 3.14 decreasing the contribution by **(£211,650)**
  - A projected decreased contribution contained in this report for 2021/22 of **(£261,000)**
  - The favourable impact of COVID-19 in 2021/22 of **£261,000**
- 1.3 The Capital Programme is projected to be **(£873,000)** lower than the Approved budget due mainly to a re-profiling of the Coach Park and IT projects.
- 1.4 Capital Receipts are projected to be **(£286,000)** which is **(£258,000)** higher than the Approved Budget due to a projected increase in Housing Right to Buy monies.
- 1.5 In terms of Council Tax, Business Rates, Sundry Debtors and Supplier Performance:
  - **Council Tax collection** in year performance was **57.20%** (56.70% in 2020/21) and total arrears were **£3,447,721** and the Council's share is **£448,204** (£2,759,204 and £358,697 in 2020/21).
  - The **Council Tax Collection Fund** is projected to be in deficit, as budgeted, with the Council's c13% share being **£42,810** compared to the Approved Budget of **£126,720**. This additional income of **(£83,910)** will be included in the 2022/23 budget.
  - Sundry Debt for income to be collected in 2021/22 has reduced by **(£13,440)** or **1%** compared to 2020/21 and the value outstanding at 30 September 2021 has reduced by **(£1,074,630)** or **36%**.
  - **Retained Business Rate Income** is projected to be **(£3,122,000)** in line with the Approved Budget.
  - The **Business Rates Collection Fund** is projected to be in deficit, as budgeted, with the Council's 40% share being **£2,884,000** compared to the Approved Budget of **£908,000**. This reduction in income of **£1,976,000** is largely due to additional COVID-19 reliefs up to the end of June 2021. This sum will be included in the 2022/23 budget and will be offset by Section 31 grant.
  - There will be a timing difference due to statutory arrangements between receipt of grant in 2021/22 and the period when the deficit is charged to the Revenue Budget. Therefore the Business Rates volatility earmarked reserve will be utilised to 'smooth' the financial impact.
  - **Business Rates collection** in year performance was **55.20%** (57.20% in 2020/21) and total arrears were **£707,961** and the Council's share is **£283,184** (£992,192 and £396,877 in 2020/21).
  - The payment of suppliers within 30 days was **86.85%** and remains below our **90%** target.
- 1.6 The Council's investments achieved a risk status of **A+** that was more secure than the aim of **A-** and yield exceeded all four of the industry standard London Interbank (LIBID) yield benchmarks.

## 2. Recommendations

- 2.1. To note the report and issues raised within and that Leadership Team with Cabinet Members will continue to closely monitor and manage the Medium Term Financial Strategy.
- 2.2. To accept the funding from the Rough Sleeper Accommodation Programme of **£165,898** (capital £140,000 and revenue £25,898) and to approve an update to the Medium Term Financial Strategy to reflect the grant funding income and matching expenditure.
- 2.3. To approve the further allocations of funding from the Risk and Recovery Budget detailed at paras 3.9 and 3.10 totalling **£52,600**.

## 3. Background

### Budget Management

- 3.1. The MTFS 2020-25 approved by Council on 16 February 2021 included the Original Budget for 2021/22 and set out the allocation of resources and the policies and parameters within which managers are required to operate.
- 3.2. Throughout the financial year, Money Matters reports are provided to both Cabinet and Strategic (Overview and Scrutiny) Committee at three, six and eight month intervals to monitor performance.
- 3.3. The Money Matters reports update the Approved Budget for latest projections and the eight month report will form the basis of the Revised Approved Budget for 2021/22 and will be approved by Council on 22 February 2022.

### The Revenue Budget

- 3.4. Financial performance (excluding COVID-19) is shown in detail at **APPENDIX A** and in summary below:





## Performance compared to the Approved Budget

- 3.5. In terms of the financial impact of COVID-19, the latest projection for 2021/22 only is a favourable variance of **(£261,000)** compared to the Approved Budget and is shown in detail at **APPENDIX B**.
- 3.6. The projected impact will occur over several financial years with the element related to Council Tax and Business Rates collection fund impacting on the revenue budget in later years.
- 3.7. The overall projected variance is shown in summary below and in detail at **APPENDIX B** by Service Area:

			Variance		
			Virement	COVID-19	Other Variances
Shaping place					
	●	Additional cost for removal of Travellers			2,740
	●	Ridware House support unlikely to be reclaimable although other options for funding being explored			48,600
	●	Additional Street Naming and Numbering Income			(19,000)
	●	Additional Street Cleansing income			(5,000)
	●	Earmarked Reserve No Longer Required			(8,500)
	●	Transfers	1,540		
Developing prosperity					
	●	Transfers	(13,600)		
A good council					
	●	Additional ICT Licenses expenditure			19,000
	●	Additional strategic capacity			30,000
	●	Minor balance			(2,170)
	●	Loss of income related to providing customer services for Staffordshire County Council			7,000
	●	Increase in bank charges for more online payments			8,000
	●	Additional legal support costs			20,000
	●	Corporate Priorities			160,330
	●	Transfers	12,060		
COVID-19					
	●	Projected income losses lower than budgeted		(261,000)	
Total - Net Cost of Services			0	(261,000)	261,000
			0		
Corporate Expenditure					
Net Treasury - increased interest receipts					0
					0
Earmarked Reserves					0
Funding					0
Transfer (to)/from General Reserves					£0

## Risk and Recovery Budget

- 3.8. The current allocations in relation to the risk and recovery budget are summarised below:

Name	Allocated
Supporting the Visitor Economy	246,000
Regional Marketing Strategy	45,000
Youth Unemployment Initiatives	105,000
Health and Wellbeing Initiatives	100,000
Apprenticeships within the Council	75,000
<b>Total Committed</b>	<b>£571,000</b>
Unallocated	570,380
<b>Total</b>	<b>£1,141,380</b>

3.9. A number of further potential project related allocations, totalling **£52,600**, were identified as part of the service and financial planning process and these are shown in the table below:

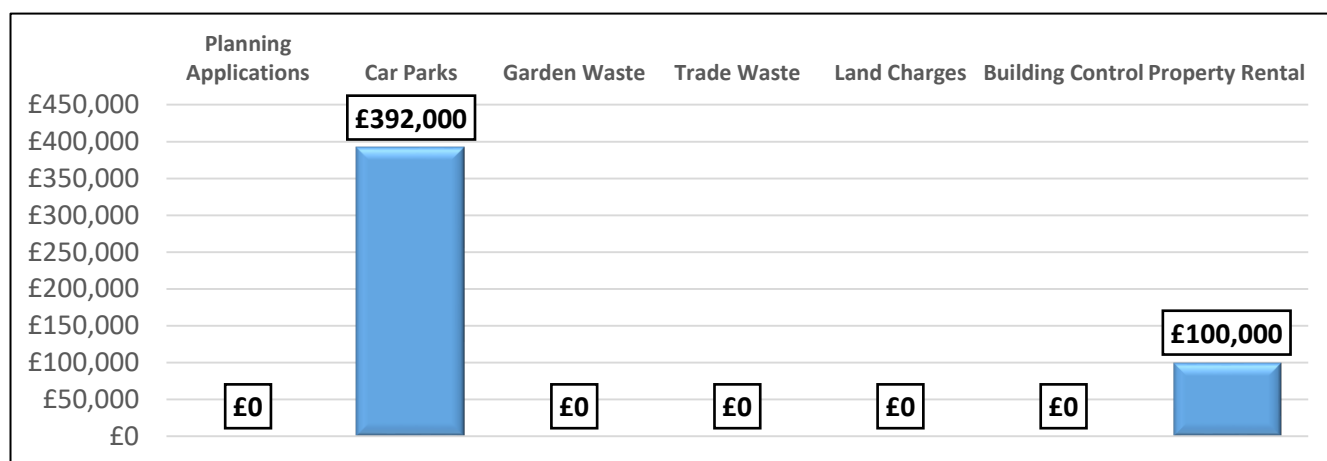
Revenue Bids	Service	2021/22	2022/23	2023/24	2024/25	Total
Enterprise for Success	Economic Growth		10,000			10,000
VE - Staffs DMP	Economic Growth		12,000	12,000	12,000	36,000
VE - Website Health	Economic Growth		6,600			6,600
<b>Total Revenue</b>		<b>0</b>	<b>28,600</b>	<b>12,000</b>	<b>12,000</b>	<b>52,600</b>

3.10. It is recommended that these projects totalling **£52,600** are funded from the unallocated balance of **£570,380** and this would reduce the sum available to **£517,780** or **45%** of the Approved Budget.

## Fees and Charges

3.11. The gross fees and charges budgets for 2021/22 together with actual income achieved over the last seven years are shown in detail at **APPENDIX B**.

3.12. The projected variances for those with the highest value are:



3.13. The reductions (shown as positive number in the chart above) attributable to COVID-19 are included in the projections shown at **APPENDIX B** although an element will be compensated through the income losses scheme. The reasons for any significant variances are:

- **A projected reduction in income from Car Parks** – the income continues to be impacted by COVID-19 although the element up to the 30 June 2021 will partly be offset by the income compensation scheme.
- **A projected reduction in income from Property Rental** – some properties have become vacant in addition to existing tenants struggling to keep up with rentals due.

## Closing the Funding Gap Progress

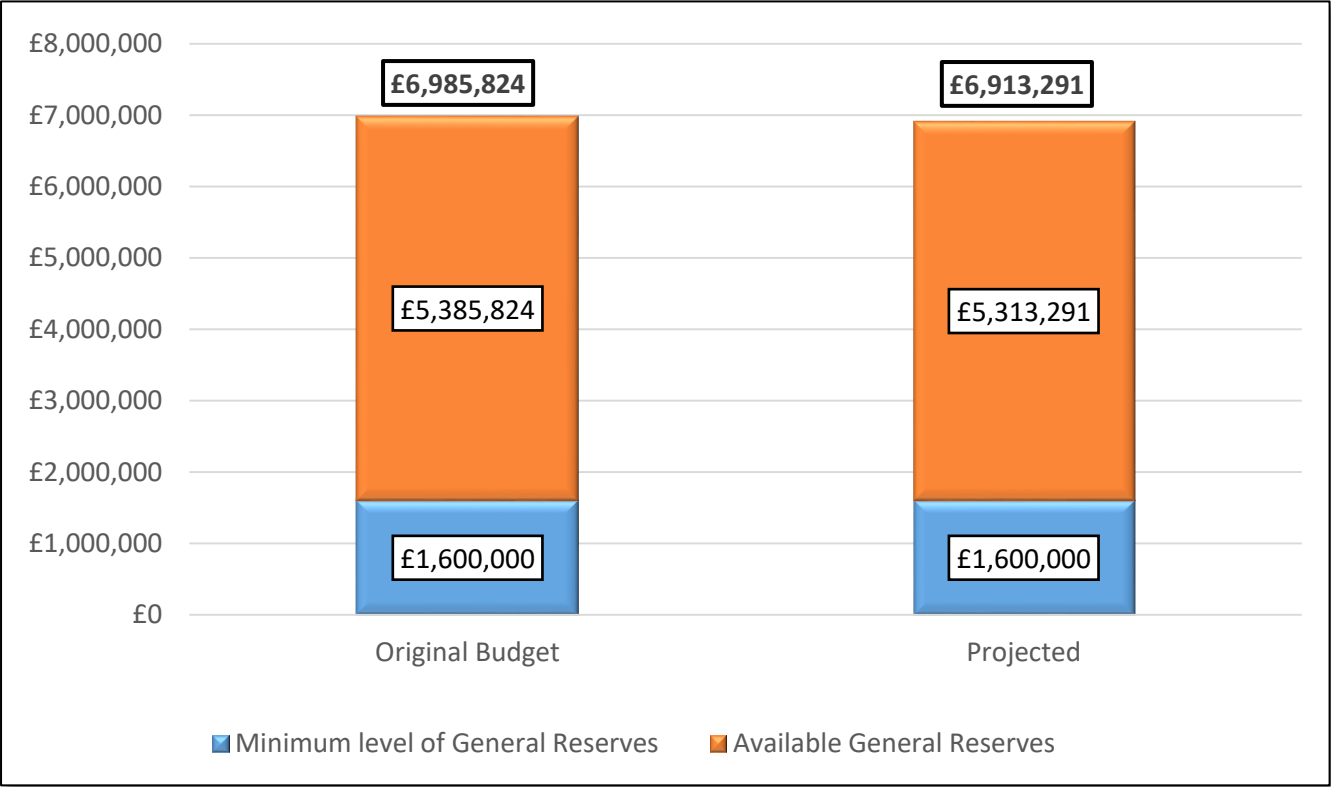
3.14. The progress (excluding any recommendations contained in this report) on closing the Funding Gap is:

	Cabinet Date	2021/22 (£411,000)	2022/23 £1,323,870	2023/24 £2,004,530	2024/25 £2,120,570	2025/26 £2,309,400
<b>Original Funding Gap</b>						
Payroll Contract	09/02/2021	14,910	(2,990)	(13,190)	(13,190)	(13,190)
Garrick Theatre	13/04/2021	0	(40,000)	(100,000)	(150,000)	(175,000)
Money Matters 2021/22 Three Months	07/09/2021	(24,270)	(3,370)	(3,370)	(3,370)	(3,370)
Dual Stream Recycling	07/09/2021	0	73,000	76,000	79,000	82,000
Development Management Service Structure	07/09/2021	221,010	222,980	224,980	227,990	231,080
<b>Total Adjustments</b>		<b>211,650</b>	<b>249,620</b>	<b>184,420</b>	<b>140,430</b>	<b>121,520</b>
<b>Approved Funding Gap / (Contribution to General Reserves)</b>		<b>(£199,350)</b>	<b>£1,573,490</b>	<b>£2,188,950</b>	<b>£2,261,000</b>	<b>£2,430,920</b>

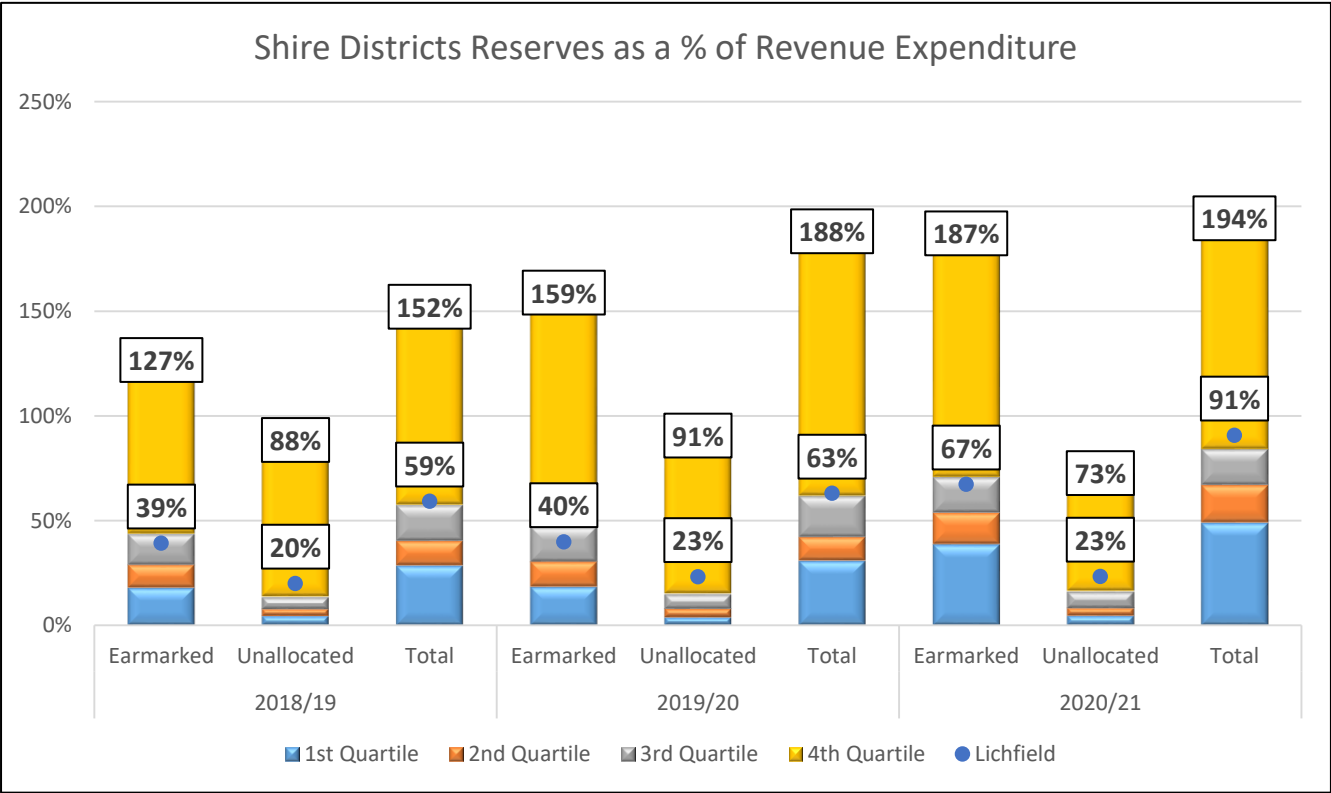
3.15. The progress on closing the Funding Gap will continue to be monitored throughout the year.

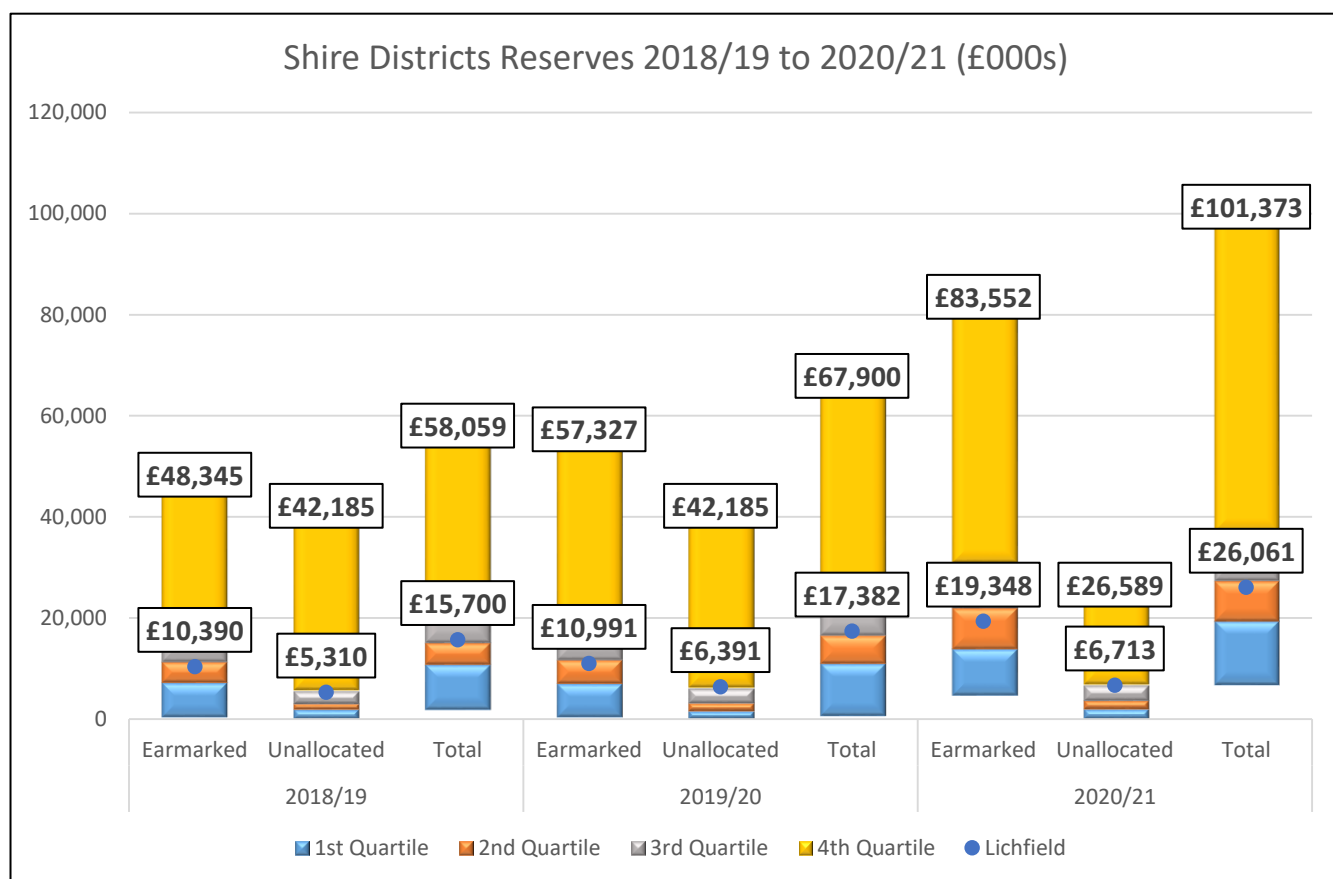
Revenue General Reserves

3.16. The Original Budget estimated general reserves of **£6,985,824** at 31 March 2022. The current projected level is **£6,913,291**, a reduction of **(£72,533)** (with further details at para 1.2) as shown below:



3.17. The level of General (unallocated) and Earmarked Reserves in relative terms and as a percentage of Revenue Expenditure (as defined in the Revenue Outturn Form) is shown for the last three years in the charts below:





3.18. These comparisons show that the Council's reserves were in a healthy position relative to all District Councils and this provides an element of resilience for financial 'shocks' such as the COVID-19 pandemic.

#### **The Rough Sleeper Accommodation Programme**

3.19. The Council made a bid for grant funding from this programme to deliver additional units of longer-term, move-on accommodation and support service.

3.20. On 22 October 2021 it was announced that the Council had been successful in its bid for funding to support the acquisition of 4 units of accommodation.

3.21. The funding allocated to the Council was both capital and revenue in nature:

Year	Revenue	Capital	Total
2021/22	£1,992	£140,000	£141,992
2022/23	£11,953		£11,953
2023/24	£11,953		£11,953
<b>Total</b>	<b>£25,898</b>	<b>£140,000</b>	<b>£165,898</b>

3.22. The capital funding will supplement the existing Approved Budget for housing acquisitions and the revenue funding will provide interim ongoing support for these properties by Spring Housing under the rough sleeper pathway scheme.

## The Capital Programme

3.23. The Original Budget of **£6,530,000** was approved by Council on 16 February 2021. There have been four updates to this budget during 2021/22:

- Introduction of Dual Stream Recycling in 2022 project of **£229,000** approved by Cabinet on 7 September 2021
- Slippage from 2020/21 of **£762,000** approved by Cabinet on 8 June 2021
- Adjustments from Money Matters Quarter 1 of **(£116,000)** Approved by Cabinet on 7 September 2021
- Acceptance of Decarbonisation Grant Funding of **£263,000** approved by Cabinet on 9 February 2021.

3.24. The Approved Budget is therefore **£7,668,000**.

3.25. The Capital Programme performance is projected to be below budget by **(£873,000)** compared to the Approved Budget. This above budget performance, compared to both the Original and the Approved Budgets, is shown by Strategic Plan Priority below and in detail at **APPENDIX C**:

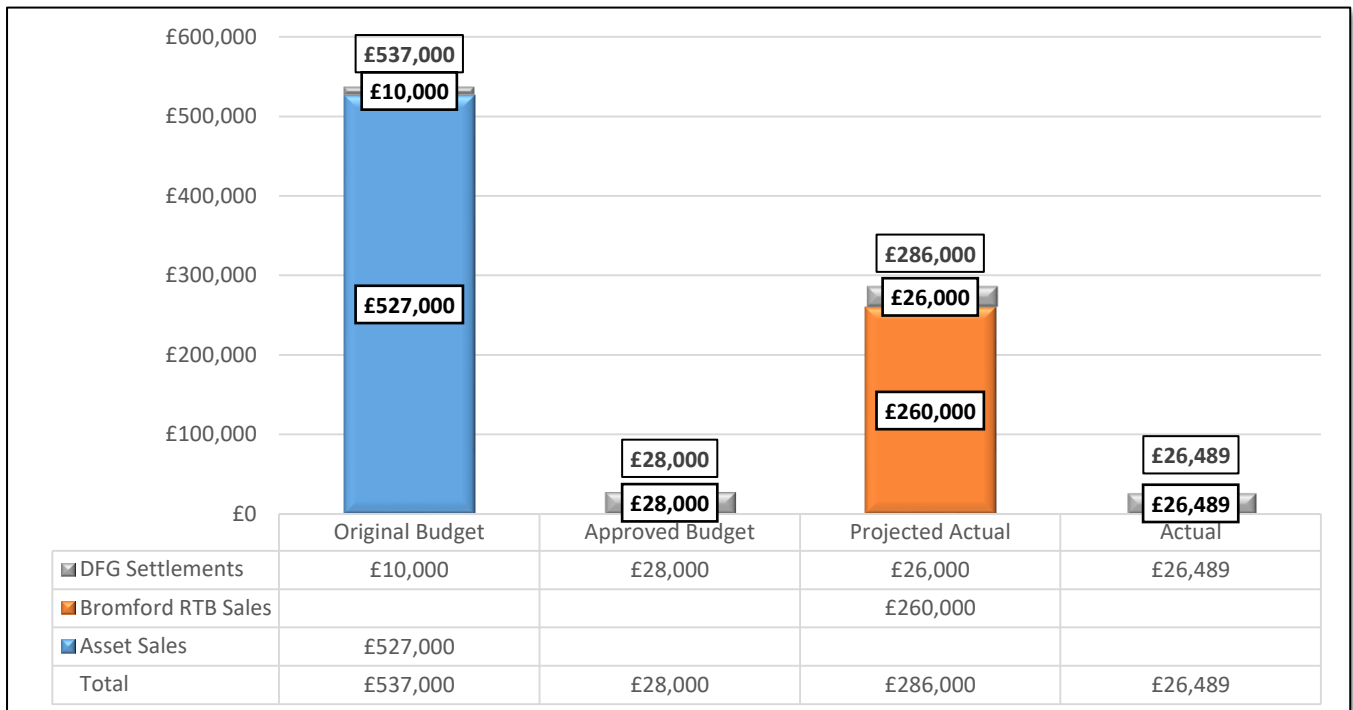


## Performance compared to the Approved Budget

3.26. There are projected variances compared to the Approved Budget related to:

	Projected Variances	
	Profiling	Other
Beacon Park Pathway – Quotes for work higher than budget this will be funded from revenue		£7,000
<b>Enabling People Total</b>	<b>£0</b>	<b>£7,000</b>
Canal Towpath Improvements – Project expected to overspend, to be funded by S106 Admin monies		£8,000
Vehicle Replacement Programme (Waste) – Spend brought forward from 2022/23	£21,000	
Vehicle Replacement Programme (Other) – Purchase of vehicle funded by Climate Change reserve		£21,000
<b>Shaping Place Total</b>	<b>£21,000</b>	<b>£29,000</b>
Vehicle Replacement Programme (Car Parks) – Delayed to 2022/23	(£10,000)	
Coach Park – Delayed due to a Lands Tribunal	(£580,000)	
Car Parks Variable Message Signing – Delayed to 2022/23	(£32,000)	
<b>Developing Prosperity Total</b>	<b>(£622,000)</b>	<b>£0</b>
Equipment Storage – Increase due to price increases, funded partially by Property Planned Maintenance (Former Depot Sinking Fund project) and revenue.		£25,000
Property Planned Maintenance – See above		(£11,000)
New Financial Information System – Further implementation likely to take place next financial year	(£44,000)	
IT Projects – Spend delayed until 2022/23	(£278,000)	
<b>A Good Council Total</b>	<b>(£322,000)</b>	<b>£14,000</b>
<b>Total Projected Variance</b>	<b>(£923,000)</b>	<b>£50,000</b>
	<b>(£873,000)</b>	

3.27. The Original and Approved Budgets, projected and actual capital receipts are shown below:

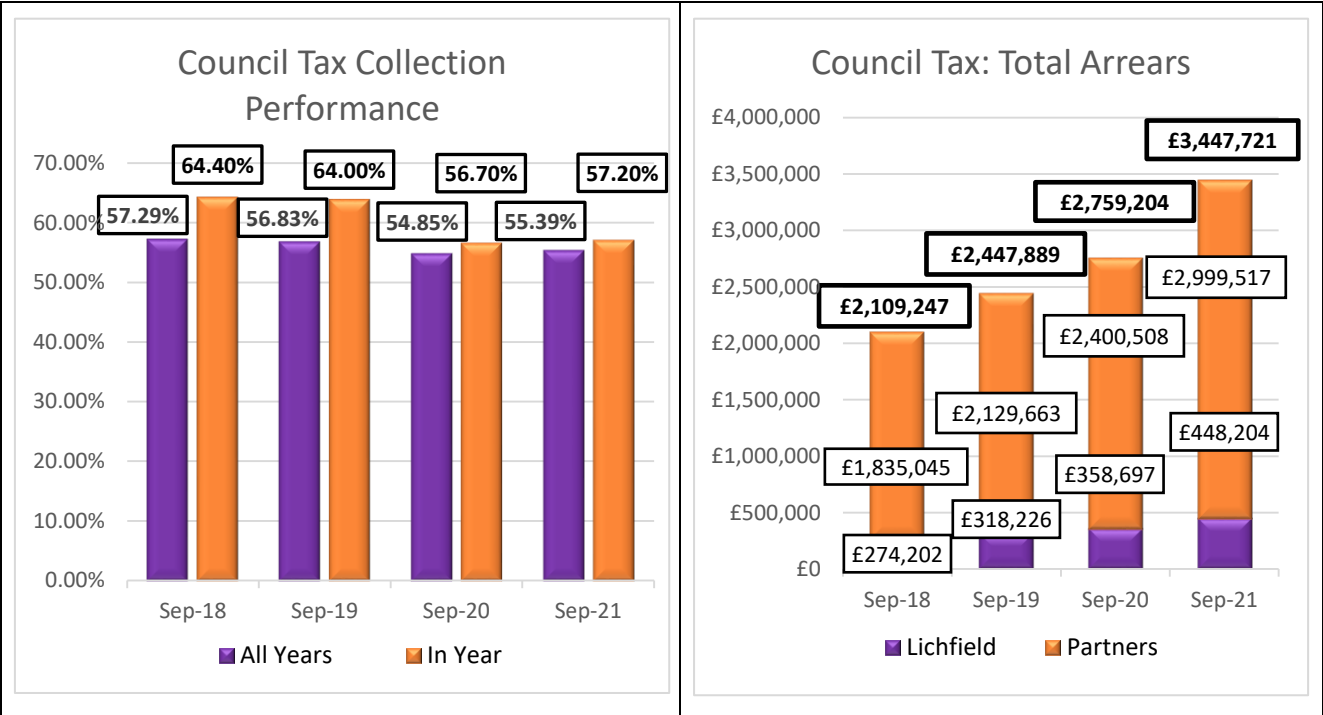


3.29 There is projected to be **(£286,000)** capital receipts received in 2021/22 compared to the Approved Budget of **(£28,000)**.

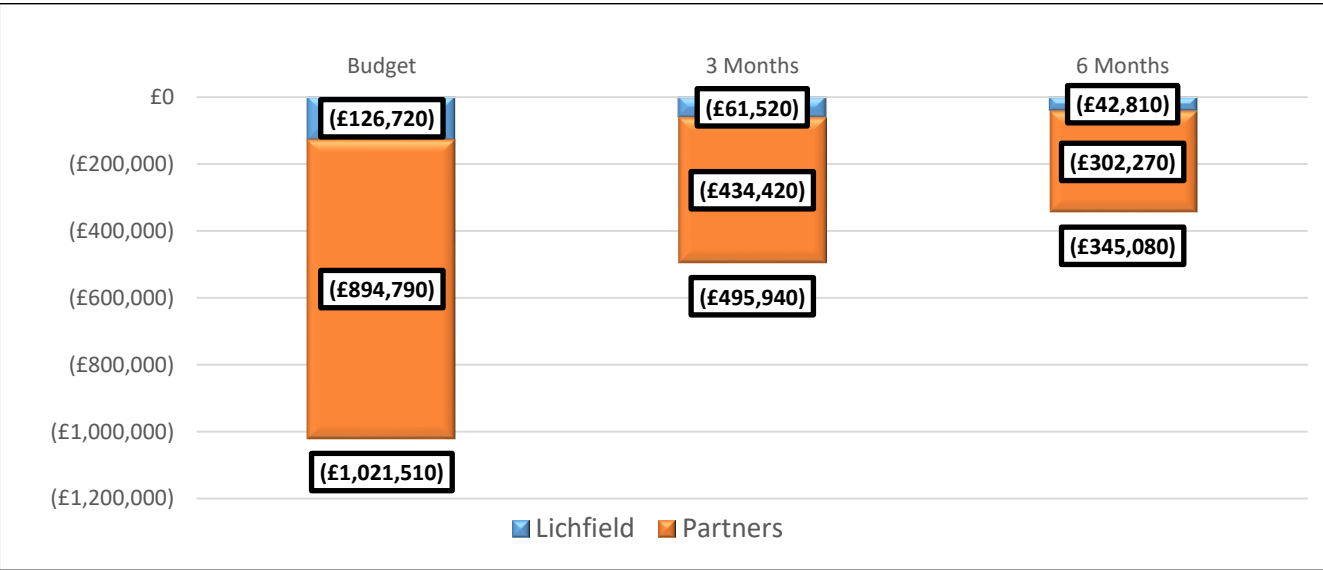
3.30 The increase is related to the Council's share of Right to Buy receipts based on the latest projections provided by Bromford Housing Association.

Council Tax

3.31. The collection performance for Council Tax debt is shown below:



3.32. The Council Tax Collection Fund, at the six month’s stage, is projected to be in deficit by **£345,080** and the Council’s share is **£42,810** based on Lichfield’s (including Parishes) current share of Council Tax of **13%**:

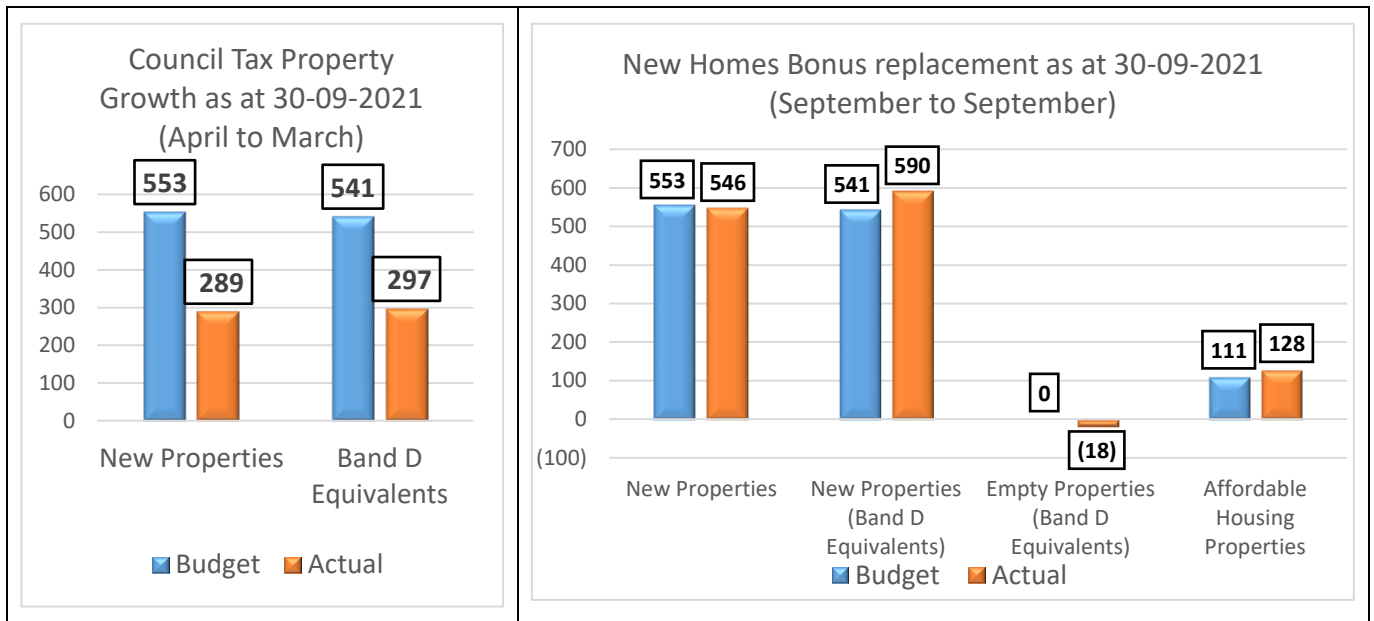


3.33. The main reasons for the projected lower deficit than budgeted of **£676,430** are:

- A lower deficit than budgeted in 2020/21 of **£537,779** (Council share £68,298)
- A higher provision for bad debts of **(£409,556)** (Council share (£52,014))
- A higher Council Tax income of **£548,207** due to housing delivery rates beginning to increase and recover (Council share £69,622).

## Housing Supply

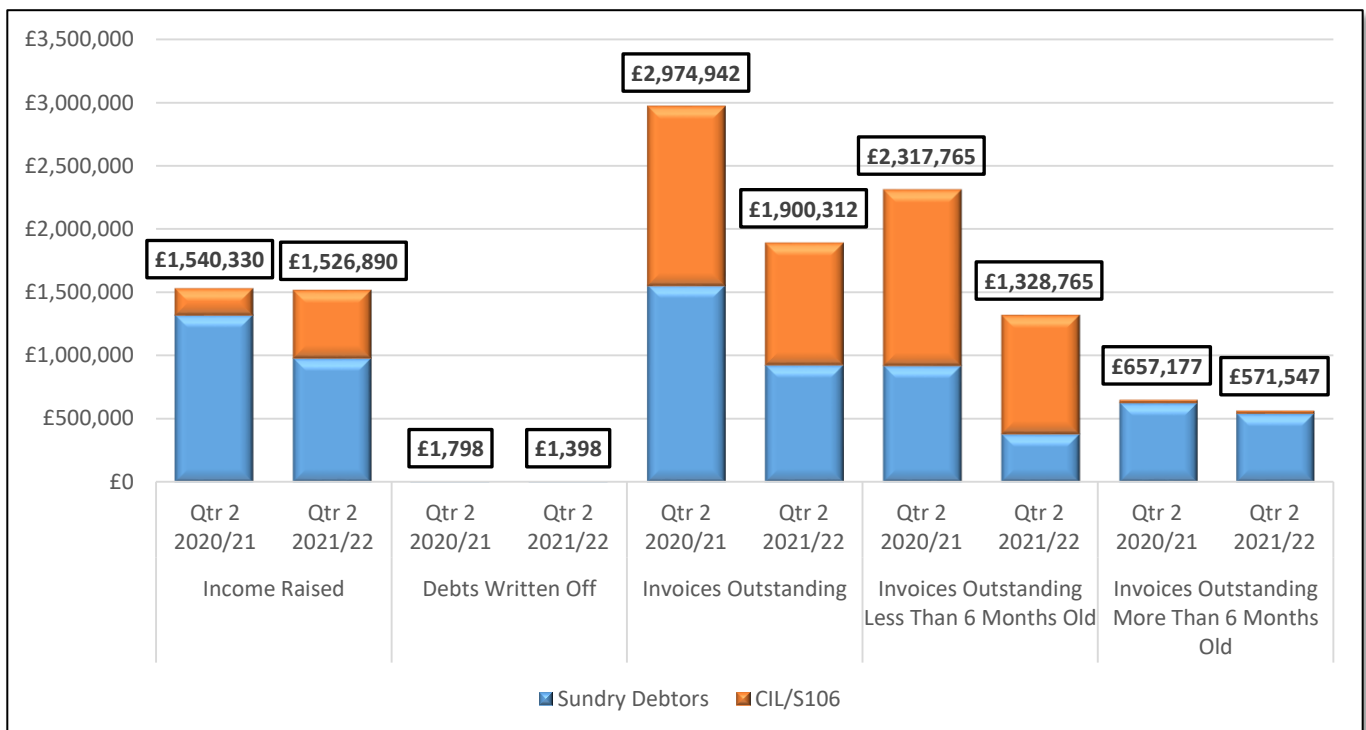
3.34. The completions for Council Tax (left hand chart) from April 2021 to September 2021 and New Homes Bonus (right hand chart) from September 2020 to September 2021 are shown below:



3.35. The current performance is in line with the budget at the six month's stage. However performance could still be impacted by COVID-19 either through delays in completions or updating records of completions. Any delivery delays will impact on Council Tax and potentially New Homes Bonus income in the Medium Term Financial Strategy.

## Sundry Debtors (including Community Infrastructure Levy (CIL) and Section 106 (S106))

3.36. The transaction levels and collection performance in 2021/22 compared to 2020/21 is shown below:



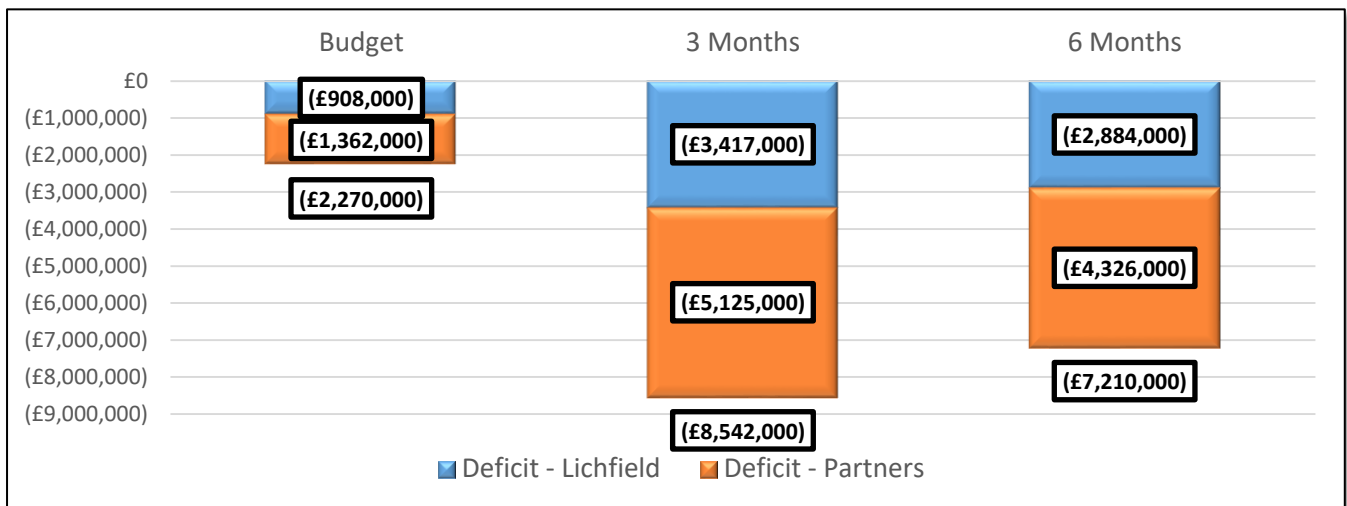
3.37. Total income raised in the first six months of 2021/22 is (**£13,440**) or (**1%**) lower than for the same period in 2020/21.

3.38. Invoices outstanding has decreased by (**£1,074,630**) or (**36%**) due to the timing of when some large invoices have been raised and paid and CIL/Section 106 payments being based on delivery.



## Business Rates

3.39. The Business Rates Collection Fund is projected to be in deficit by **£7,210,000**:

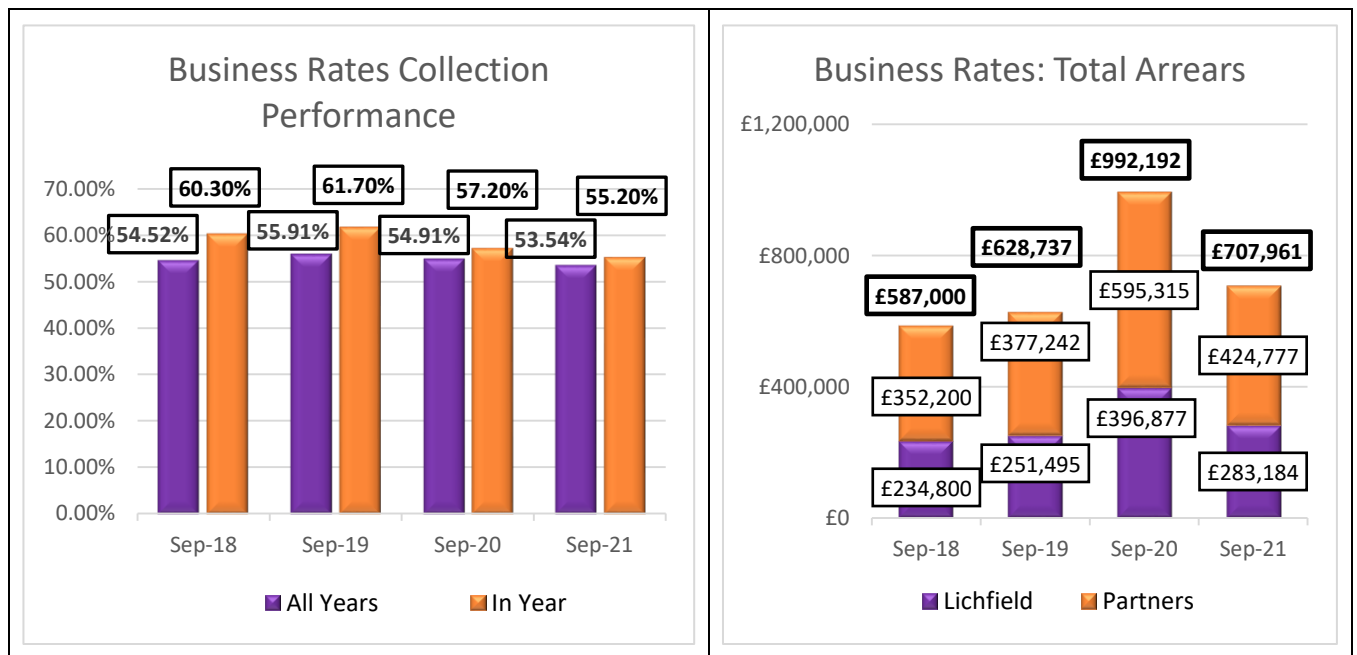


3.40. The main reasons for the projected higher deficit than budgeted of **(£4,940,000)** are:

- A higher deficit than budgeted in 2020/21 of **(£206,833)** (Council share (£82,800)).
- Higher allowances for appeals and bad debts of **(£337,000)** (Council share (£134,800)).
- Additional COVID-19 leisure, hospitality and retail reliefs up to the end of June 2021 and other changes in income due of **(£4,396,167)** (Council share (£1,758,500)).

3.41. It is important to note that Section 31 grants receivable in 2021/22 will largely offset this deficit.

3.42. The collection performance for Business Rates is shown below:



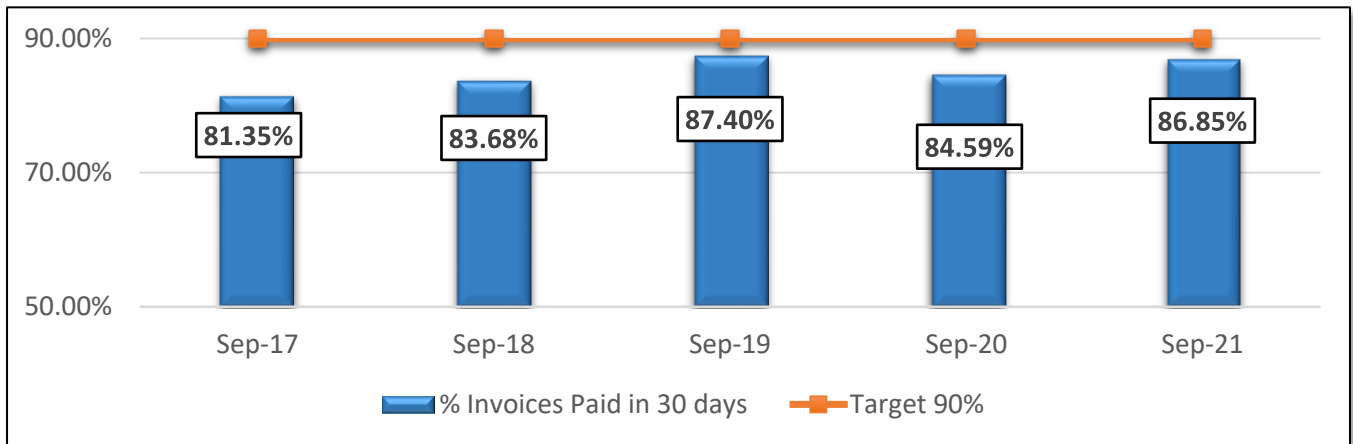
3.43. The Retained Business Rate income is projected to be the same as the Approved Budget of **(£3,122,000)**.

3.44. There are however a number of significant changes within the projection, including the Section 31 grant to offset the additional COVID-19 reliefs in the Collection Fund. These are explained further below:

- The Council's share of additional Section 31 grant to offset COVID-19 reliefs of **(£2,092,000)**.
- Other changes to levy payments and Section 31 grants of **£59,000**.
- Transfer of additional grant and other changes to the Business Rates volatility Earmarked Reserve to offset the deficit in later years of **£2,033,000**.

## Supplier Payment Performance

3.45. The performance of invoice payments to suppliers within 30 days for the last five years is:



3.46. There are initiatives taking place, including the improvements to procurement, wider use of payment cards for low value transactions and analysis of the performance by Service Area, that are aimed at improving payment performance.

## Investment Strategy

3.47. The Council can undertake investments for three broad purposes:

- It approves the support of public services by lending or buying shares in other organisations – **Service Investments**.
- To earn investment income – **Commercial Investments**.
- It has surplus cash, as a result of its day to day activities, when income is received in advance of expenditure or where it holds cash on behalf of another body ready for payment in the future – **Treasury Management Investments**.

3.48. The Government has recognised in recent guidance, as a result of increased commercial activity, that the principles included in Statutory Guidance requiring that all investments should prioritise security and liquidity over yield must also be applied to service and commercial investments.

3.49. The Guidance requires the approval by Council of an Investment Strategy Report to increase the transparency around service and commercial investment activity. The Council approved its Investment Strategy Report on **16 February 2021**.

## Service Investments

3.50. There is one significant approved investment of a service nature and the investment and net return included in the Approved Budget is detailed below:

	Approved Budget				
	2021/22	2022/23	2023/24	2024/25	2025/26
<b>Approved Loan to the Local Authority Company</b>	<b>£675,000</b>	<b>£675,000</b>	<b>£675,000</b>	<b>£675,000</b>	<b>£675,000</b>
Net Income	£0	(£4,000)	(£18,000)	(£22,000)	(£22,000)
Net Return		(0.59%)	(2.67%)	(3.26%)	(3.26%)

3.51. To date, the loan to the Local Authority Company has not taken place and therefore the budgeted interest is not being generated.

## Commercial Investments

3.52. No commercial investments are currently planned.

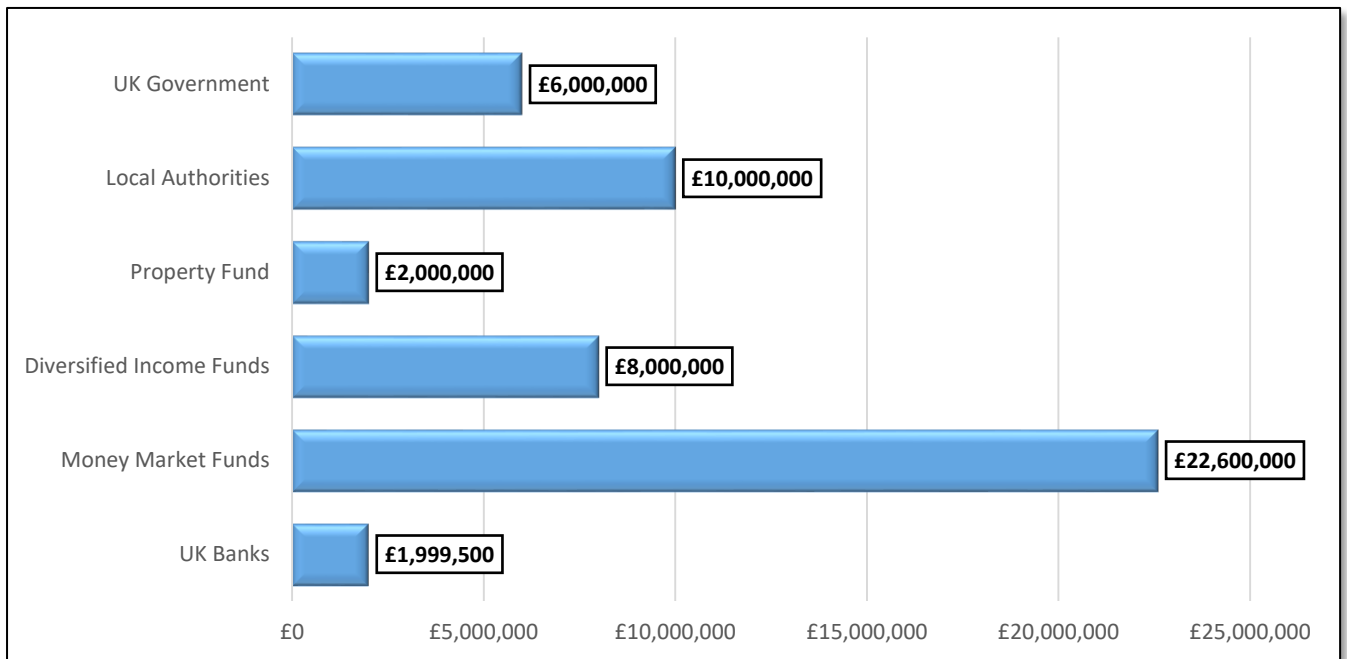
## Treasury Management Investments

3.53. The performance of the Treasury Management function should be measured against the investment objectives of Security (the safe return of our monies), Liquidity (making sure we have sufficient money to pay for our services) and Yield (the return on our investments).

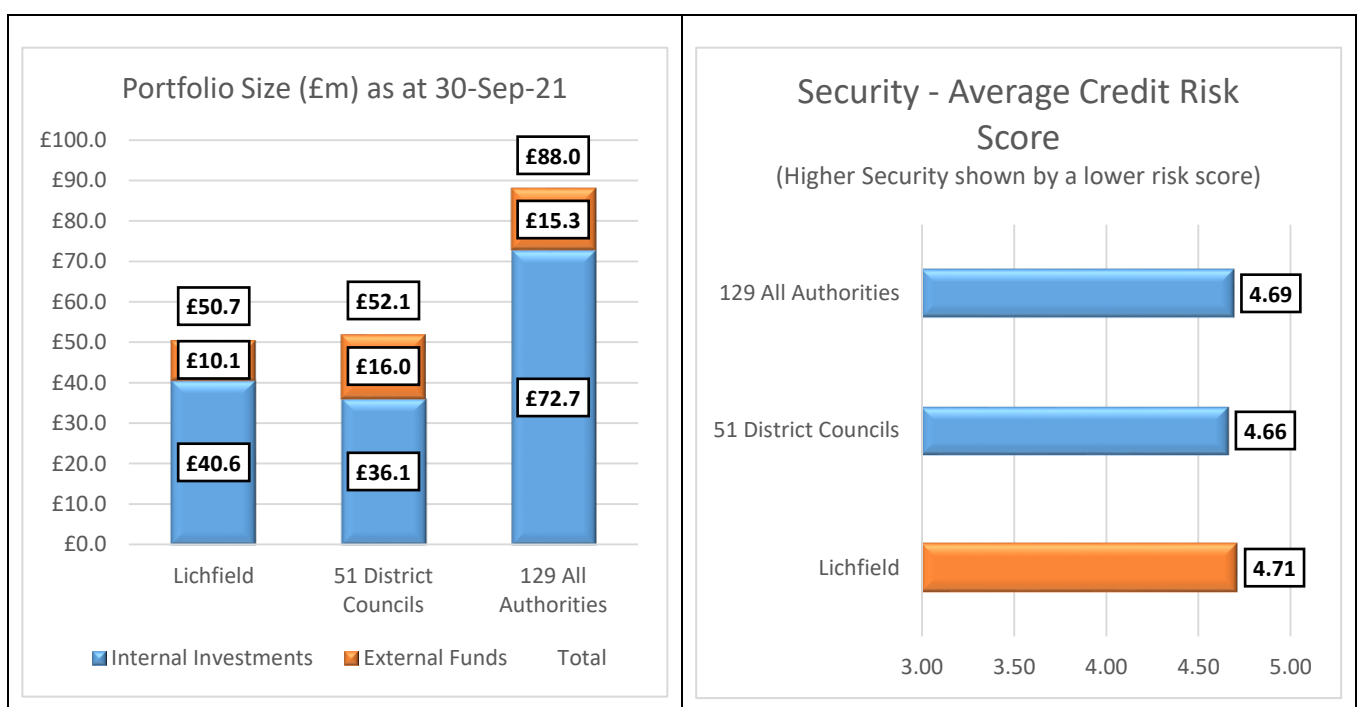
3.54. In addition, external borrowing is considered against the objectives of it being affordable (the impact on the budget and Council Tax), prudent and sustainable (over the whole life).

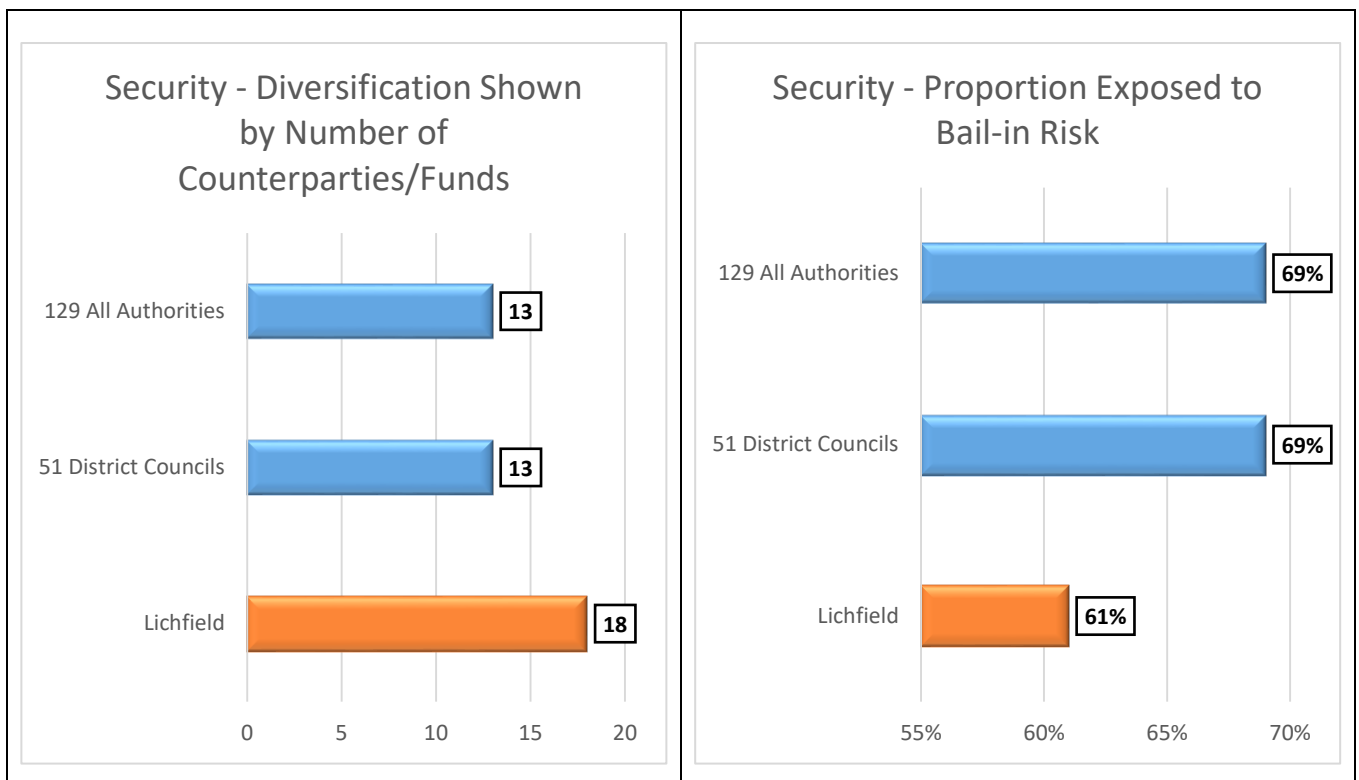
### The Security of Our Investments

3.55. The investments the Council had at the 30 September 2021 of **£50,599,500** (with the Property and Diversified Income Funds valued at original investment of **£2m or £3m**) by type and Country are summarised below and in detail at **APPENDIX D**:

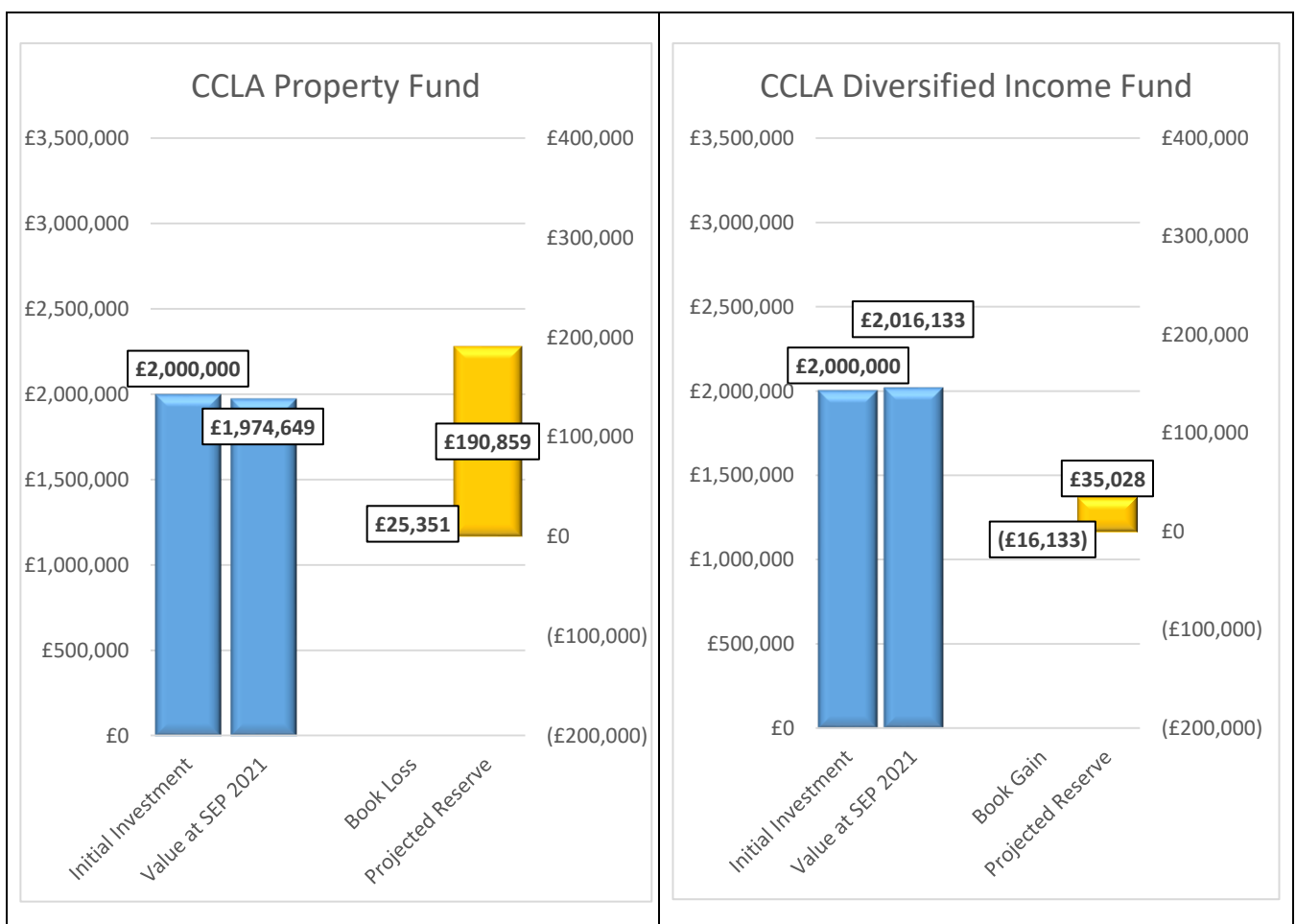


3.56. The Council's portfolio size (with the Property and Diversified Income Funds valued at its current value of **£10.1m**), average credit score, diversification and exposure to 'Bail in' risk compared to Arlingclose Clients is shown below:





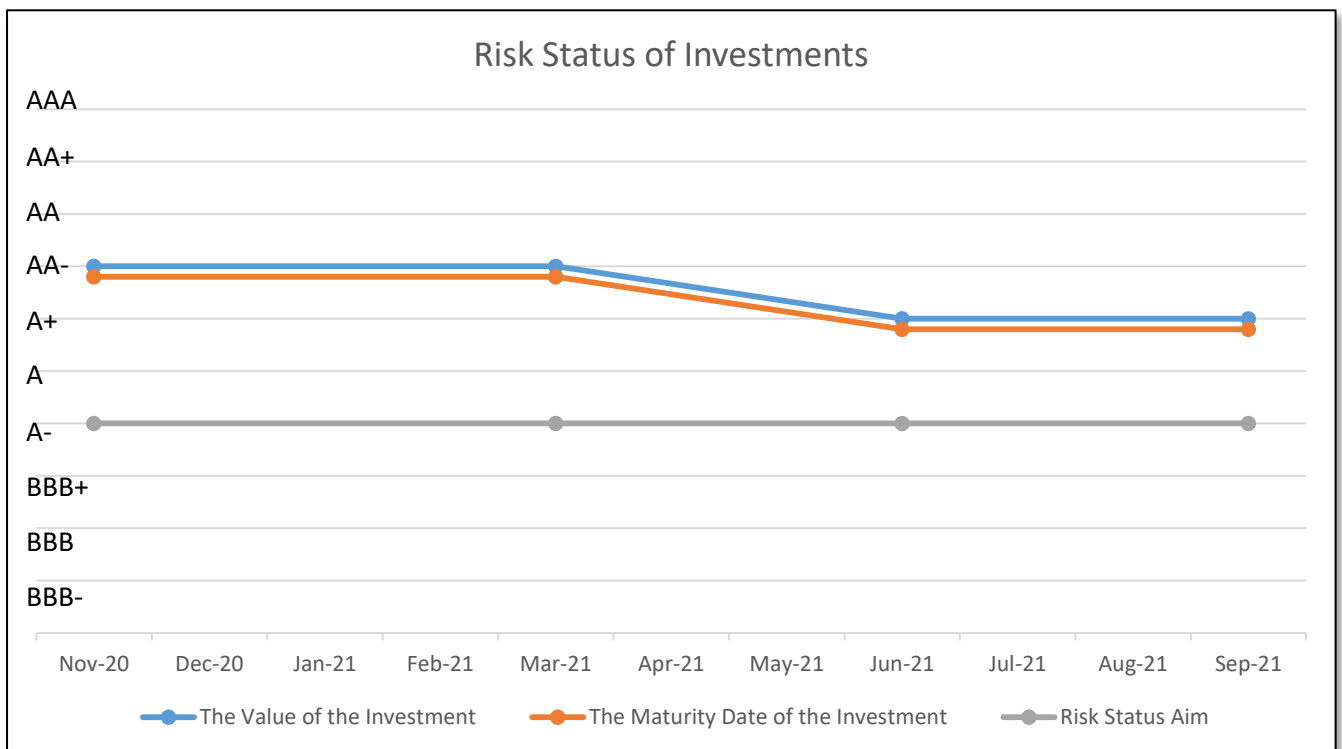
3.57. The current value of the Property Fund and the Diversified Income Funds, together with the projected value of the earmarked reserves in 2021/22 intended to offset reductions in value (these are a book loss until the investment is sold and they become actual), are shown below:





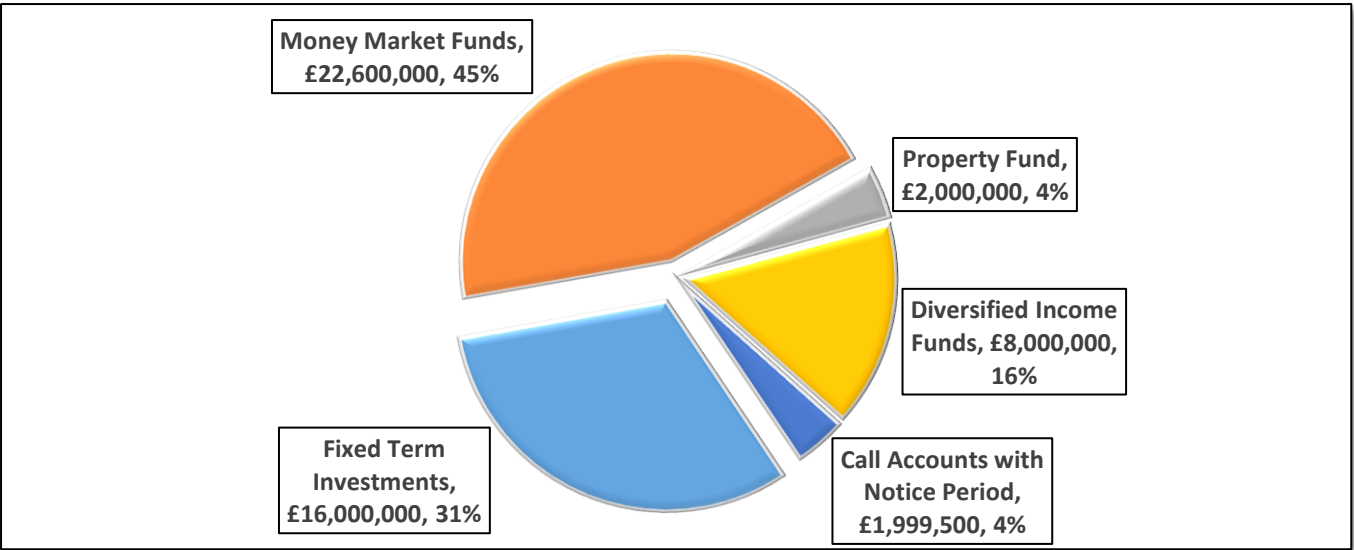
3.58. Overall in terms of strategic investments, there is a 'book gain' of **(£86,951)** and the earmarked reserve to manage volatility risk is projected to be **£296,172**.

3.59. Our aim for the risk status of our investments was **A-** or higher. The risk status based on the length of the investment and the value for a 12 month period is summarised in the graph below:

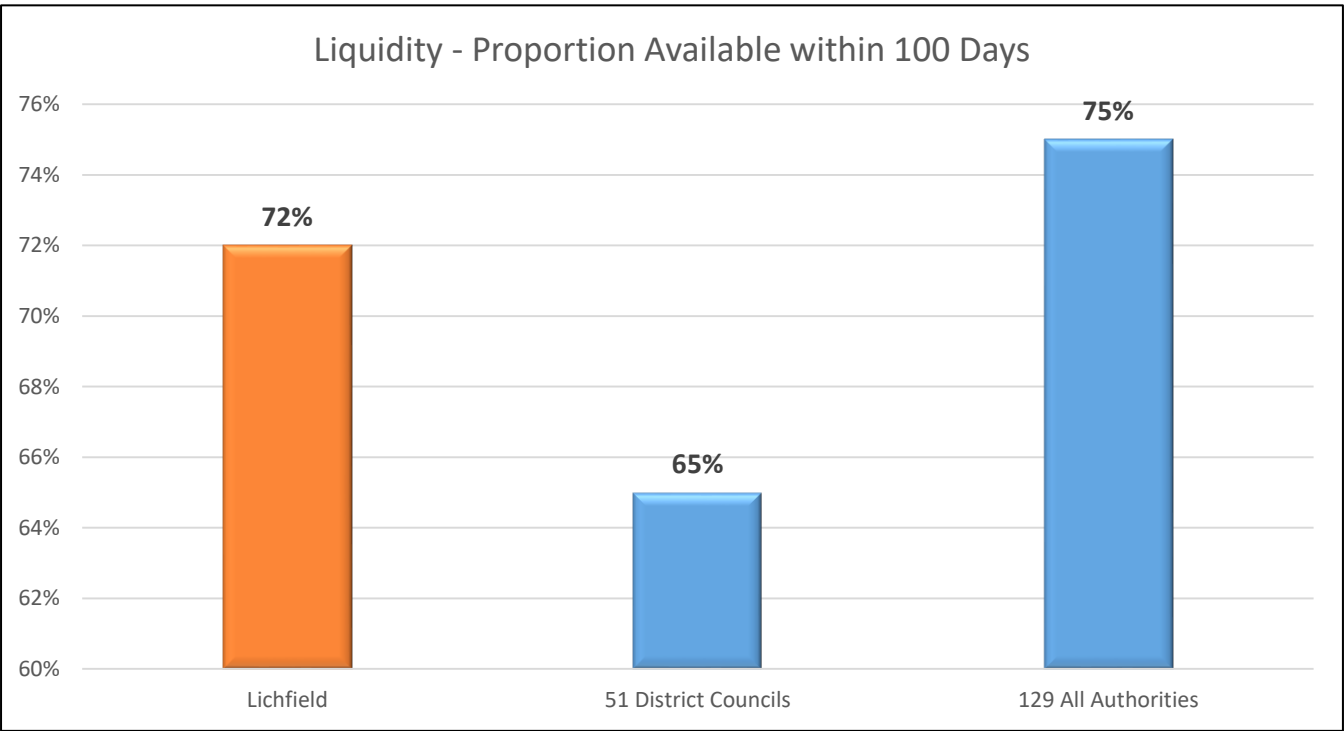


**The Liquidity of our Investments**

- 3.60. The Council has not had to temporarily borrow during 2021/22.
- 3.61. A significant proportion of investments are retained in instant access Money Market Fund investments to ensure there is sufficient cash available to pay for goods and services. The investments by type are shown below:

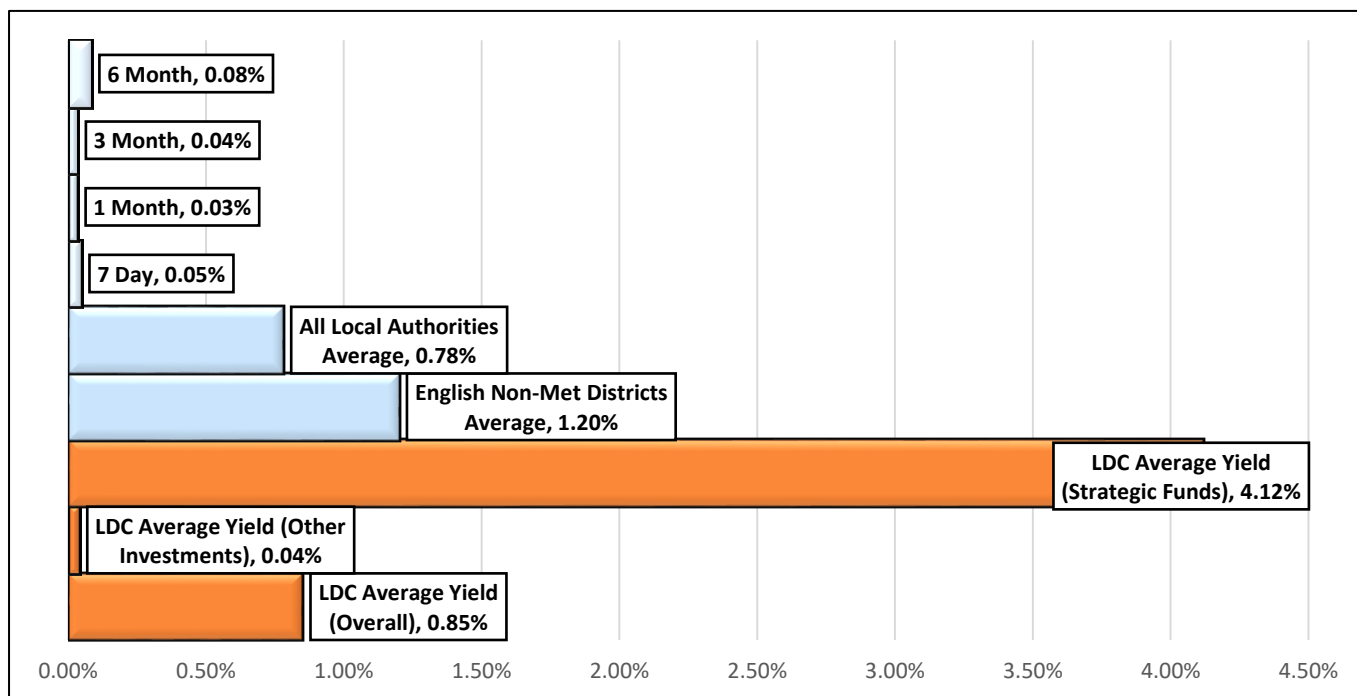


- 3.62. The proportion of the investment portfolio available within 100 days compared to all Arlingclose clients is shown below:



## The Return or Yield of our Investments

3.63. The yield the Council achieved compared to a number of industry standard benchmarks (including our preferred benchmark of the seven day LIBID rate) and all Arlingclose clients is shown below:



3.64. The investment activity during the financial year is projected to generate **(£390,000)** of gross investment income compared to a budget of **(£350,000)**.

## The External Borrowing Portfolio

3.65. The Council's external borrowing portfolio, including the premiums for early repayment, is shown below:

	Principal	Average Rate	Years to Final Maturity	(Premium) /Discount
PWLB Fixed Equal Instalment of Principal (EIP)	£1,126,280	2.59%	18.5	(£159,508)
PWLB Fixed Annuity	£1,001,145	1.71%	6.7	(£37,311)
<b>TOTAL Borrowing</b>	<b>£2,127,425</b>	<b>2.18%</b>	<b>12.9</b>	<b>(£196,819)</b>

Alternative Options	These are considered as part of the ongoing development of the Strategic Plan and the Medium Term Financial Strategy.
Consultation	Consultation is undertaken as part of the Strategic Plan and with Leadership Team.
Financial Implications	<p>The Medium Term Financial Strategy projected general reserves at 31 March 2022 would be <b>£6,985,824</b>.</p> <p>At this six months stage, general reserves are forecast to be <b>£6,913,291</b>. This is a reduction of <b>(£72,533)</b> and is related to:</p> <ul style="list-style-type: none"> <li>• A higher than budgeted contribution in 2020/21 of <b>£139,117</b></li> <li>• Approved updates in 2021/22 summarised in para 3.14 decreasing the contribution by <b>(£211,650)</b></li> <li>• A projected decreased contribution contained in this report for 2021/22 of <b>(£261,000)</b></li> <li>• The favourable impact of COVID-19 in 2021/22 of <b>£261,000</b></li> </ul>

Approved by Section 151 Officer	Yes
Legal Implications	No specific legal implications.  The recommended changes to the Medium Term Financial Strategy, not part of the approved Budget Framework, will require the approval of Full Council.
Approved by Monitoring Officer	Yes
Equality, Diversity and Human Rights Implications	There are no additional Equality, Diversity or Human Rights implications.
Crime & Safety Issues	There are no additional Crime and Safety Issues.
Environmental Impact	These areas are addressed as part of the specific areas of activity prior to being included in Lichfield District Council's Strategic Plan.
GDPR/Privacy Impact Assessment	These areas are addressed as part of the specific areas of activity prior to being included in Lichfield District Council's Strategic Plan.

	Risk Description & Risk Owner	Original Score (RYG)	How We Manage It	Current Score (RYG)
<b>Strategic Risk SR1 - Non achievement of the Council's key priorities contained in the Strategic Plan due to the availability</b>				
A	Council Tax is not set by the Statutory Date of <b>11 March 2022</b>	Likelihood : Green Impact : Red Severity of Risk : Yellow	Full Council set with reference to when major preceptors and Parishes have approved their Council Tax Requirements.	Likelihood : Green Impact : Red Severity of Risk : Yellow
B	Implementation of the Check, Challenge and Appeal Business Rates Appeals and more frequent revaluations	Likelihood : Yellow Impact : Red Severity of Risk : Red	To closely monitor the level of appeals. An allowance for appeals has been included in the Business Rate Estimates.	Likelihood : Yellow Impact : Yellow Severity of Risk : Yellow
C	The review of the New Homes Bonus regime	Likelihood : Red Impact : Red Severity of Risk : Red	The Council responded to the recent consultation.  Not all of the projected New Homes Bonus is included as core funding in the Base Budget. In 2022/23 £400,000 is included with the balance transferred to general reserves. At this stage, no income is assumed from 2023/24 onwards.	Likelihood : Red Impact : Yellow Severity of Risk : Yellow
D	The increased Localisation of Business Rates and the Review of Needs and Resources	Likelihood : Red Impact : Red Severity of Risk : Red	To assess the implications of proposed changes and respond to consultations to attempt to influence the policy direction in the Council's favour.	Likelihood : Red Impact : Red Severity of Risk : Red
E	The affordability and risk associated with the Capital Strategy	Likelihood : Yellow Impact : Red Severity of Risk : Red	An estates management team has been recruited to provide professional expertise and advice in relation to property and to continue to take a prudent approach to budgeting.	Likelihood : Yellow Impact : Yellow Severity of Risk : Yellow
F	The public sector pay freeze in 2021/22 is not applicable to Local	Likelihood : Yellow Impact : Red Severity of Risk : Red	The current MTFs assumes that the pay freeze for those earning more than £24,000 per annum is applicable to Local Government. If	Likelihood : Yellow Impact : Yellow Severity of Risk :



	Risk Description & Risk Owner	Original Score (RYG)	How We Manage It	Current Score (RYG)
	Government		this does not prove to be the case, an element of general reserves can be utilised to fund the increase in 2021/22 and projections for later years will be updated in the MTFS.	Yellow
G	Sustained higher levels of inflation in the economy	Likelihood : Yellow Impact : Yellow Severity of Risk : Yellow	To maintain a watching brief on economic forecasts, ensure estimates reflect latest economic projections and where possible ensure income increases are maximised to mitigate any additional cost.	Likelihood : Yellow Impact : Yellow Severity of Risk : Yellow
<b>Strategic Risk SR3: Capacity and capability to deliver / adapt the new s</b>				
H	The financial impact of COVID-19 is not fully reimbursed by Government and exceeds the reserves available resulting in a Section 114 notice	Likelihood : Yellow Impact : Red Severity of Risk : Yellow	The use of general and earmarked reserves to fund any shortfall	Likelihood : Yellow Impact : Yellow Severity of Risk : Yellow
I	The Council cannot achieve its approved Delivery Plan for 2022/23	Likelihood : Yellow Impact : Red Severity of Risk : Red	There will need to be consideration of additional resourcing and/or reprioritisation to reflect the ongoing impact of the pandemic	Likelihood : Yellow Impact : Yellow Severity of Risk : Yellow
J	The resources available in the medium to longer term to deliver the Strategic Plan are diminished	Likelihood : Yellow Impact : Red Severity of Risk : Red	The MTFS will be updated through the normal review and approval process	Likelihood : Yellow Impact : Yellow Severity of Risk : Yellow
K	Government and Regulatory Bodies introduce significant changes to the operating environment	Likelihood : Red Impact : Red Severity of Risk : Red	To review all proposed policy changes and respond to all consultations to influence outcomes in the Council's favour	Likelihood : Yellow Impact : Yellow Severity of Risk : Yellow

<b>Background Documents</b>	<ul style="list-style-type: none"> <li>• Medium Term Financial Strategy (Revenue and Capital) 2020-2025 (MTFS) – Cabinet 9 February 2021</li> <li>• Money Matters: 2020/21 Review of Financial Performance against the Financial Strategy – Cabinet 8 June 2021</li> <li>• Medium Term Financial Strategy (MTFS) – Cabinet 6 July 2021</li> <li>• Money Matters: 2021/22 Review of Financial Performance against the Financial Strategy – Cabinet 7 September 2021</li> </ul>
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<b>Relevant web link</b>	
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## Revenue Financial Performance – Variance to Budget 2021/22

Area	2021/22					
	Original Budget £	Approved Budget £	Projected Outturn £	Projected Variance £	Variance to Original Budget £	2021/22 Target Variance (+/-) £
Enabling people	1,482,790	1,511,540	1,511,540	-	28,750	
Shaping place	3,401,930	3,459,850	3,480,230	20,380	78,300	
Developing prosperity	(620,830)	(432,770)	(446,370)	(13,600)	174,460	
A good council	6,320,730	6,314,650	6,568,870	254,220	248,140	
COVID-19 - General Impact <sup>1</sup>	(4,000)	(61,000)	(322,000)	(261,000)	(318,000)	
COVID-19 - Specific Risks	1,141,380	1,141,380	1,141,380	-	0	
<b>Net Cost of Services</b>	<b>11,722,000</b>	<b>11,933,650</b>	<b>11,933,650</b>	<b>0</b>	<b>211,650</b>	<b>0</b>
Chief Executive	167,130	212,750	454,420	241,670	287,290	2,000
Corporate Services	2,414,920	2,427,490	2,434,190	6,700	19,270	39,000
Finance and Procurement	1,881,200	1,892,200	1,900,200	8,000	19,000	15,000
Governance & Performance	1,874,760	1,853,680	1,871,810	18,130	(2,950)	15,000
Regulatory Services, Housing & Wellbeing	1,352,010	1,359,380	1,359,380	-	7,370	16,000
Economic Growth & Development Services	(127,210)	89,540	89,540	-	216,750	67,000
Operational Services	3,021,810	3,018,230	3,004,730	(13,500)	(17,080)	96,000
COVID-19 - General Impact	(4,000)	(61,000)	(322,000)	(261,000)	(318,000)	-
COVID-19 – Risk and Recovery	1,141,380	1,141,380	1,141,380	-	0	
<b>Net Cost of Services</b>	<b>11,722,000</b>	<b>11,933,650</b>	<b>11,933,650</b>	<b>0</b>	<b>211,650</b>	<b>250,000</b>
Net Treasury Position	(182,000)	(182,000)	(182,000)	-		
<b>Net Operating Cost</b>	<b>11,540,000</b>	<b>11,751,650</b>	<b>11,751,650</b>	<b>0</b>		
Transfer (from) / to General Reserve	411,000	199,350	199,350	-		
<b>Net Revenue Expenditure</b>	<b>11,951,000</b>	<b>11,951,000</b>	<b>11,951,000</b>	<b>0</b>		
<b>Financed by:</b>						
Retained Business Rates	(3,122,000)	(3,122,000)	(3,122,000)	-		
Business Rates Cap	(110,000)	(110,000)	(110,000)	-		
Lower Tier Services Grant	(151,000)	(151,000)	(151,000)	-		
Local Council Tax Support Grant	(126,000)	(126,000)	(126,000)	-		
New Homes Bonus	(1,282,000)	(1,282,000)	(1,282,000)	-		
Council Tax Collection Fund						
(Surplus)/Deficit	38,000	38,000	38,000	-		
Council Tax	(7,198,000)	(7,198,000)	(7,198,000)	-		

<sup>1</sup> The COVID-19 – General Recovery budget has been allocated to the relevant service areas, £112,000 to Developing Prosperity and £181,000 to Net Treasury

## Reasons for the Outturn Budget Performance by Service Area

Projected Variance £		Expenditure		Income		COVID-19	
		One Off £	Recurring £	One Off £	Recurring £	Expenditure £	Income £
241,670	Chief Executive	192,740	-	48,600	-	3,000	(71,000)
6,700	Corporate Services	19,000	-	(19,000)	6,700	-	(81,000)
8,000	Finance and Procurement	26,000	-	(18,000)	-	-	-
18,130	Governance & Performance	12,500	15,000	9,380	(18,750)	-	-
(13,500)	Operational Services	94,740	(8,500)	(94,740)	(5,000)	-	-
-	Regulatory Services, Housing & Wellbeing	-	12,420	-	(12,420)	-	-
-	Economic Growth & Development Services	-	3,060	-	(3,060)	-	-
-	Net Treasury Position	-	-	-	-	-	(112,000)
(261,000)	COVID-19	-	-	-	-	-	-
-	<b>Net Operating Cost</b>	<b>£344,980</b>	<b>£21,980</b>	<b>(£73,760)</b>	<b>(£32,530)</b>	<b>£3,000</b>	<b>(£264,000)</b>
-	Earmarked Reserves	-	-	-	-	-	-
-	<b>Net Operating Cost</b>	<b>£344,980</b>	<b>£21,980</b>	<b>(£73,760)</b>	<b>(£32,530)</b>	<b>£3,000</b>	<b>(£264,000)</b>
-	Funding	-	-	-	-	-	-
-	<b>Transfer (to)/from General Reserves</b>	<b>£344,980</b>	<b>£21,980</b>	<b>(£73,760)</b>	<b>(£32,530)</b>	<b>£3,000</b>	<b>(£264,000)</b>

## Chief Executive

Projected Variance £	Reason	Expenditure		Income	
		One Off £	Recurring £	One Off £	Recurring £
2,740	Additional costs incurred to remove travellers from Council sites	2,740			
30,000	Chief Operating Officer costs	30,000			
48,600	Ridware House Emergency Incident - Insurance claim unlikely to be repaid			48,600	
160,330	Corporate Priorities	160,330			
<b>£241,670</b>	<b>Total</b>	<b>£193,070</b>	<b>-</b>	<b>£48,600</b>	<b>-</b>

## Corporate Services

Projected Variance £	Reason	Expenditure		Income	
		One Off £	Recurring £	One Off £	Recurring £
19,000	One Off Extra Licencing Costs	19,000			
(19,000)	Additional Street Naming and Numbering Income			(19,000)	
(300)	Income from attestations				(300)
7,000	Loss of income related to providing customer services for Staffordshire County Council				7,000
<b>£6,700</b>	<b>Total</b>	<b>£19,000</b>	<b>-</b>	<b>(£19,000)</b>	<b>£6,700</b>

**Finance and Procurement**

Projected Variance £	Reason	Expenditure		Income	
		One Off £	Recurring £	One Off £	Recurring £
-	Grant Funding to Cover Increasing Cost of External Audit and Corresponding Expenditure	18,000		(18,000)	
8,000	Increase in bank charges for more online payments	8,000			
<b>£8,000</b>	<b>Total</b>	<b>£26,000</b>	<b>-</b>	<b>(£18,000)</b>	<b>-</b>

**Governance & Performance**

Projected Variance £	Reason	Expenditure		Income	
		One Off £	Recurring £	One Off £	Recurring £
20,000	Additional legal support costs	20,000			
(1,870)	Adjust budgets for Rights of Way Income	(7,500)	15,000	9,380	(18,750)
<b>£18,130</b>	<b>Total</b>	<b>£12,500</b>	<b>£15,000</b>	<b>£9,380</b>	<b>(£18,750)</b>

**Operational Services**

Projected Variance £	Reason	Expenditure		Income	
		One Off £	Recurring £	One Off £	Recurring £
(5,000)	Additional ad hoc income street cleansing				(5,000)
(8,500)	Tidying of budgets Trunk Road EARM No Longer Required	94,740	(8,500)	(94,740)	
<b>(£13,500)</b>	<b>Total</b>	<b>£94,740</b>	<b>(£8,500)</b>	<b>(£94,740)</b>	<b>(£5,000)</b>

**Regulatory Services, Housing & Wellbeing**

Projected Variance £	Reason	Expenditure		Income	
		One Off £	Recurring £	One Off £	Recurring £
-	Income for Community Lottery and Creation of Corresponding Reserve to Fund the Local Community and Voluntary Sector		10,000		(10,000)
-	Property Rental Income and Creation of Corresponding Sink Fund for Maintenance etc.		2,420		(2,420)
<b>-</b>	<b>Total</b>	<b>-</b>	<b>£12,420</b>	<b>-</b>	<b>(£12,420)</b>

**Economic Growth & Development Services**

Projected Variance £	Reason	Expenditure		Income	
		One Off £	Recurring £	One Off £	Recurring £
	Reallocation of increased CIL income to Economic Development for Commercial Property Subscription		3,060		(3,060)
<b>-</b>	<b>Total</b>	<b>-</b>	<b>£3,060</b>	<b>-</b>	<b>(£3,060)</b>

## COVID-19 Projected Impact

Details	Original Budget	Approved Budget	Projection	Variance
Support for Operational Services Contracts	£0	£0	£0	£0
Housing and Homelessness Support	£0	£12,000	£11,000	(£1,000)
Additional Hardship / Discretionary Housing Payments	£0	£0	£0	£0
Additional costs of Waste Collection	£0	£0	£0	£0
ICT Support Costs for Remote Working	£0	£0	£0	£0
Additional Personal Protective Equipment (PPE), Building Cleaning and Other Costs	£0	£0	£4,000	£4,000
Bank Charges for Grant Processing	£0	£0	£0	£0
Transport for food deliveries	£0	£0	£0	£0
Project costs	£0	£0	£0	£0
Other costs	£0	£0	£0	£0
<b>Total Additional Costs</b>	<b>£0</b>	<b>£12,000</b>	<b>£15,000</b>	<b>£3,000</b>
Government Support	(£441,000)	(£441,000)	(£441,000)	£0
Cost reimbursements	£0	£0	£0	£0
National Leisure Recovery Fund	£0	£0	£0	£0
<b>Net Additional Costs</b>	<b>(£441,000)</b>	<b>(£429,000)</b>	<b>(£426,000)</b>	<b>£3,000</b>
Reduced Sales, Fees and Charges <sup>2</sup>	£561,000	£497,000	£233,000	(£264,000)
Income Guarantee Scheme	(£124,000)	(£129,000)	(£129,000)	£0
Reductions in Council Tax (LDC & Parishes 13%) (will impact in later years)	£152,000	£197,000	£257,000	£60,000
Reductions in Business Rates (LDC 40%) (will impact in later years) see note below	£837,000	£227,000	£227,000	£0
<b>Total financial impact</b>	<b>£985,000</b>	<b>£363,000</b>	<b>£162,000</b>	<b>(£201,000)</b>
<b>Impact in 2021/22</b>	<b>(£4,000)</b>	<b>(£61,000)</b>	<b>(£322,000)</b>	<b>(£261,000)</b>
<b>Impact in later years</b>	<b>£989,000</b>	<b>£424,000</b>	<b>£484,000</b>	<b>£60,000</b>

Note : The Business Rates additional retained growth of £1.342m included in the Business Rate estimates is after taking account of this COVID-19 reduction

<sup>2</sup> The elements of reduced sales, fees and charges related to property income of £112,000 and treasury management income £181,000 have now been allocated directly to the relevant budgets rather than being assessed in the central COVID-19 budget.

Fees and Charges<sup>3</sup>

Income Type				Annual Trend						
	Annual	Actual	Year	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21
	Budget		End	Actual	Actual	Actual	Actual	Actual	Actual	Actual
	£000	£000	Variance	£000	£000	£000	£000	£000	£000	£000
Planning Applications	781	707	0	771	629	1,030	824	797	744	695
Car Parks	1,921	738	392	1,746	1,748	1,986	2,078	2,198	2,105	752
Garden Waste	1,480	1,367	0	0	0	0	231	1,495	1,478	1,618
Trade Waste <sup>4</sup>	442	504	0	338	390	407	415	443	469	485
Land Charges	298	169	0	183	297	312	279	286	253	272
Building Control	917	622	0	454	507	557	547	553	896	1,032
Property Rental	657	393	100	644	681	687	729	839	744	680
<b>Total of Highest Value Fees &amp; Charges</b>	<b>6,497</b>	<b>4,500</b>	<b>492</b>	<b>4,134</b>	<b>4,251</b>	<b>4,980</b>	<b>5,102</b>	<b>6,611</b>	<b>6,689</b>	<b>5,535</b>
<b>Other Income</b>										
Licensing				217	185	236	224	241	245	160
Leisure Centre				1,782	1,819	1,879	1,629	183	0	0
VAT Claim				0	0	0	0	1,103	0	0
Court Costs				252	233	218	198	214	222	154
Recycling				14	347	439	463	331	283	280
Grounds Maintenance				162	161	168	195	217	264	273
Other				1,839	1,139	1,319	1,124	1,057	1,063	908
<b>Total Income</b>				<b>8,400</b>	<b>8,136</b>	<b>9,239</b>	<b>8,936</b>	<b>9,957</b>	<b>8,766</b>	<b>7,310</b>

<sup>3</sup> The COVID-19 projections for sales, fees and charges income shown in APPENDIX B are based on all approved budgets whereas these projections focus on those of the highest value.

<sup>4</sup> The Head of Operational Services has requested that no variance be reported for Trade Waste because the actual stated is based on invoices raised, not actually paid.

## Capital Programme 2021/22

Project	Original Budget	Approved Budget	Actual to Date	Projected Actual	Variance
New Build Parish Office/Community Hub	92,000	92,000	0	92,000	0
Armitage with Handsacre Village Hall storage container	6,000	6,000	5,700	6,000	0
Re-siting/improvement of Armitage War Memorial	120,000	120,000	80,000	120,000	0
Replacement of canopy and installation of artificial grass at Armitage	3,000	3,000	0	3,000	0
Burntwood LC CHP Unit	0	64,000	(4,835)	64,000	0
Friary Grange - Short Term Refurbishment	240,000	209,000	39,180	209,000	0
Replacement Leisure Centre	278,000	328,000	143,284	328,000	0
Beacon Park Pathway	0	30,000	0	37,000	7,000
Burntwood Leisure Centre - Decarbonisation Scheme	532,000	443,000	223,870	443,000	0
Accessible Homes (Disabled Facilities Grants)	1,272,000	1,100,000	416,886	1,100,000	0
Home Repair Assistance Grants	22,000	10,000	551	10,000	0
Decent Homes Standard	147,000	147,000	0	147,000	0
Energy Insulation Programme	22,000	0	0	0	0
DCLG Monies	212,000	212,000	0	212,000	0
Unallocated S106 Affordable Housing Monies	429,000	541,000	95,736	541,000	0
<b>Enabling People Total</b>	<b>3,375,000</b>	<b>3,305,000</b>	<b>1,000,370</b>	<b>3,312,000</b>	<b>7,000</b>
Canal Towpath Improvements (Brereton & Ravenhill)	36,000	36,000	36,854	44,000	8,000
Loan to Council Dev Co.	675,000	675,000	0	675,000	0
Lichfield St Johns Community Link	35,000	35,000	0	35,000	0
Staffordshire Countryside Explorer	44,000	44,000	0	44,000	0
Dam Street Toilets	0	40,000	0	40,000	0
Vehicle Replacement Programme (Waste)	0	0	0	21,000	21,000
Bin Purchase	150,000	240,000	0	240,000	0
Dual Stream Recycling	0	229,000	0	229,000	0
Vehicle Replacement Programme (Other)	108,000	107,000	24,950	128,000	21,000
Env. Improvements - Upper St John St & Birmingham Road	7,000	7,000	0	7,000	0
The Leomansley Area Improvement Project	3,000	3,000	0	3,000	0
Cannock Chase SAC	44,000	44,000	42,990	44,000	0
<b>Shaping Place Total</b>	<b>1,102,000</b>	<b>1,460,000</b>	<b>104,795</b>	<b>1,510,000</b>	<b>50,000</b>
Multi Storey Car Park Refurbishment Project	250,000	259,000	170,477	259,000	0
Vehicle Replacement Programme (Car Parks)	10,000	10,000	0	0	(10,000)
Birmingham Road Site - Coach Park	625,000	880,000	2,000	300,000	(580,000)
Birmingham Road Site - Short Term Redevelopment	0	13,000	8,319	13,000	0
Car Parks Variable Message Signing	32,000	32,000	0	0	(32,000)
Old Mining College - Refurbish access and signs	13,000	13,000	0	13,000	0
St. Chads Sculpture (Lichfield City Art Fund)	5,000	5,000	5,000	5,000	0
<b>Developing Prosperity Total</b>	<b>935,000</b>	<b>1,212,000</b>	<b>185,796</b>	<b>590,000</b>	<b>(622,000)</b>
Equipment Storage	0	100,000	0	125,000	25,000
Property Planned Maintenance	289,000	390,000	0	379,000	(11,000)
New Financial Information System	225,000	269,000	151,202	225,000	(44,000)
Depot Sinking Fund	11,000	0	0	0	0
Carbonisation Project - District Council House	0	263,000	195,879	263,000	0
IT Infrastructure	35,000	123,000	69,895	110,000	(13,000)
ICT Hardware	165,000	165,000	0	0	(165,000)
IT Innovation	205,000	143,000	(650)	43,000	(100,000)
District Council House Repair Programme	188,000	238,000	0	238,000	0
<b>Good Council Total</b>	<b>1,118,000</b>	<b>1,691,000</b>	<b>416,326</b>	<b>1,383,000</b>	<b>(308,000)</b>
<b>Approved Budget</b>	<b>6,530,000</b>	<b>7,668,000</b>	<b>1,707,287</b>	<b>6,795,000</b>	<b>(873,000)</b>

Funding Source	Original Budget	Approved Budget	Projected Actual	Variance
Capital Receipts	1,301,000	1,805,000	1,209,000	(596,000)
Corporate Revenue	0	0	0	0
Borrowing Need - Borrowing and Finance Leases	278,000	328,000	328,000	0
Capital Grants and Contributions	3,071,000	3,151,000	3,119,000	(32,000)
Reserves, Existing Revenue Budgets and Sinking Funds	1,880,000	2,384,000	2,139,000	(245,000)
<b>Capital Programme Total</b>	<b>6,530,000</b>	<b>7,668,000</b>	<b>6,795,000</b>	<b>(873,000)</b>

### Investments in the 2021/22 Financial Year

The table below shows a breakdown of our investments at the 30 September 2021:

Counterparty	Principal	Matures	Days to Maturity	Rate	Credit Rating	Foreign Parent
<b>Money Market Funds</b>						
Invesco Aim	£600,000	01-Oct-21	Instant Access	0.01%	0	N/A
Blackrock Institutional	£4,000,000	01-Oct-21	Instant Access	0.01%	0	N/A
Federated	£5,000,000	01-Oct-21	Instant Access	0.01%	0	N/A
Aberdeen	£4,000,000	01-Oct-21	Instant Access	0.01%	0	N/A
BNP Paribas MMF	£4,000,000	01-Oct-21	Instant Access	0.01%	0	N/A
CCLA MMF	£5,000,000	01-Oct-21	Instant Access	0.02%	0	N/A
<b>Strategic Funds</b>						
CCLA Property Fund	£2,000,000	N/A	N/A	3.51%	N/A	No
Ninety-One Diversified Income Fund	£3,000,000	N/A	N/A	4.05%	N/A	No
CCLA Diversified Income Fund	£2,000,000	N/A	N/A	2.14%	N/A	No
Aegon Diversified Income Fund	£3,000,000	N/A	N/A	3.59%	N/A	No
<b>Fixed Term Investments</b>						
Staffordshire Moorlands District Council	£2,000,000	18-Nov-21	49	0.25%	LOCAL	
Surrey Heath Borough Council	£2,000,000	15-Dec-21	76	0.06%	LOCAL	
Monmouthshire Council	£2,000,000	28-Apr-22	210	0.10%	LOCAL	
Cheltenham Borough Council	£2,000,000	12-Nov-21	43	0.05%	LOCAL	
Ashford Borough Council	£2,000,000	19-Apr-22	201	0.07%	LOCAL	
Debt Management Office	£6,000,000	19-Oct-21	19	0.01%	UK Gov.	
<b>Call Accounts with Notice Period</b>						
Lloyds	£1,000,000	03-Jan-22	95	0.03%	A+	
HSBC	£999,500	31-Oct-21	31	0.20%	A+	
<b>Total Investments</b>	<b>£50,599,500</b>					



# Money Matters : Calculation of Business Rates 2022/23, Council Tax Base for 2022/23 and the projected Collection Fund Surplus / Deficit for 2021/22



## Cabinet Member for Finance, Procurement and Revenues & Benefits

Date:	7 December 2021
Agenda Item:	4
Contact Officer:	Anthony Thomas
Tel Number:	01543 308012
Email:	<a href="mailto:Anthony.thomas@lichfielddc.gov.uk">Anthony.thomas@lichfielddc.gov.uk</a>
Key Decision?	YES
Local Ward Members	Full Council

**Cabinet**

## 1. Executive Summary

- 1.1 To approve the calculation of the Council Taxbase (Band D residential properties) for Lichfield District, as required under Section 67 of the Local Government Finance Act (LGFA) 1992.
- 1.2 In accordance with the LGFA 1992, the Council is required to estimate the surplus/deficit on the Collection Fund for both Council Tax and Business Rates. The dates these estimates must be made are:
  - Council Tax – **15 January** (or in the event this a Saturday, Sunday or Bank Holiday, the next working day). In 2021/22 the relevant date will be **17 January 2022**.
  - Business Rates (NNDR) – **31 January** using the NNDR1 Form.
- 1.3 The Council as the Billing Authority must then notify each relevant major Precepting Authority of their share of any estimated surplus or deficit within seven days of making the estimate.
- 1.4 The Council must submit its estimates for Business Rates to the Department for Levelling Up, Housing and Communities (DLUHC) using the NNDR1 form. This form includes:
  - An estimate of the Business Rates Collection Fund surplus/deficit for the current year.
  - Estimates of the level of Business Rates to be collected for the forthcoming financial year.
- 1.5 The timing of the NNDR1 form is uncertain. To enable completion by the statutory deadline, a delegation to the Cabinet Member for Finance, Procurement and Revenues & Benefits and the Chief Financial Officer is recommended.

## 2. Recommendations

- 2.1 Cabinet approve in accordance with the relevant legislation and regulations, the Council Taxbase (Band D residential properties) for Lichfield District for the financial year 2022/23 of **39,695.1**.
- 2.2 To note the estimated Council Tax Collection fund Deficit of **£345,080** and the estimated Business Rates Collection Fund Deficit of **£7,210,000** for 2021/22.
- 2.3 To delegate authority to the Cabinet Member for Finance, Procurement and Revenues & Benefits and the Chief Financial Officer (Section 151) to:
  - Complete and certify the NNDR1 for 2022/23 on behalf of the Council.
  - Update the Council Taxbase for 2022/23 and Collection Fund projections for 2021/22 in the event of changes to guidance or the need for significant changes to underlying assumptions.

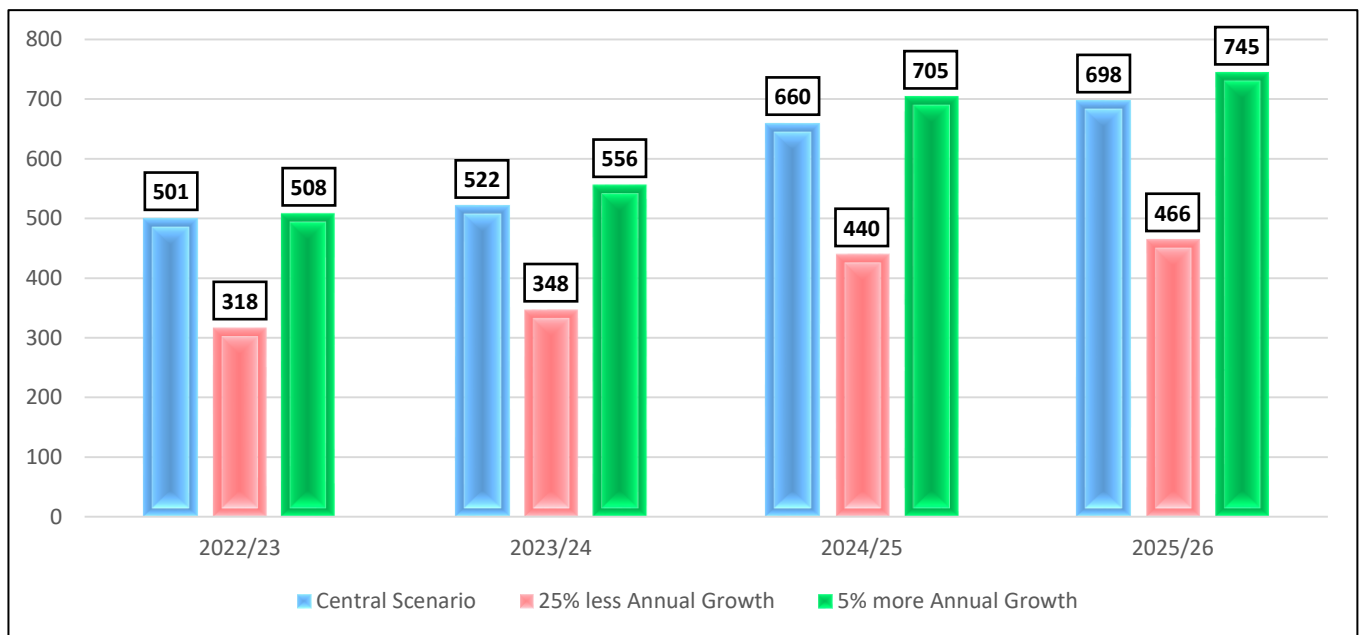
### 3. Background

#### Council Taxbase

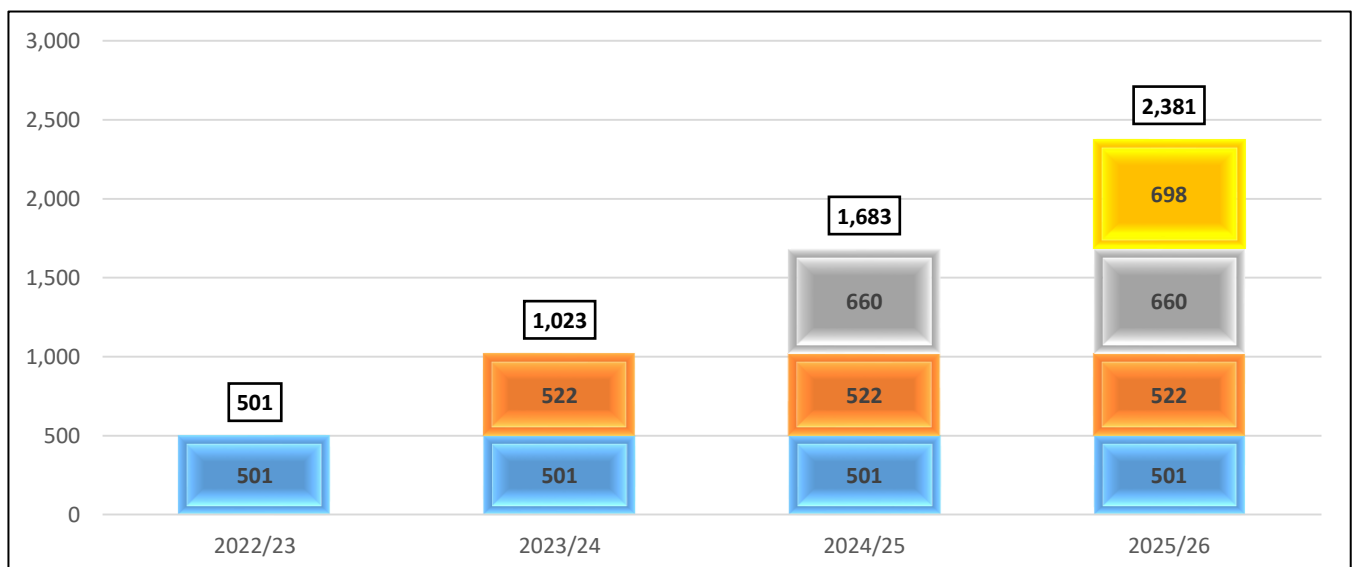
- 3.1 The Council Taxbase represents Band D residential properties within the District for Council Tax purposes.
- 3.2 The calculation includes an allowance for property growth. The starting point is the Five Year Housing Supply and this is adjusted by factors for risks such as delays or non-delivery and to convert growth to Band D equivalents.

#### Property Growth

- 3.3 The property growth (Band D Equivalents) estimated for the period of the Medium Term Financial Strategy based on the Mid-Point or central scenario of **75%** of planned property growth (shown as leftmost column for each year) being delivered plus two alternatives (50% and 80% of planned property growth), is shown in detail at **APPENDIX A** and in summary below:



- 3.4 The central scenario is also shown on a cumulative basis in the graph below. These growth projections will also potentially be used as part of the calculation of New Homes Bonus income (or its replacement).



### Council Taxbase Calculation

3.5 The Council Taxbase is calculated as follows:

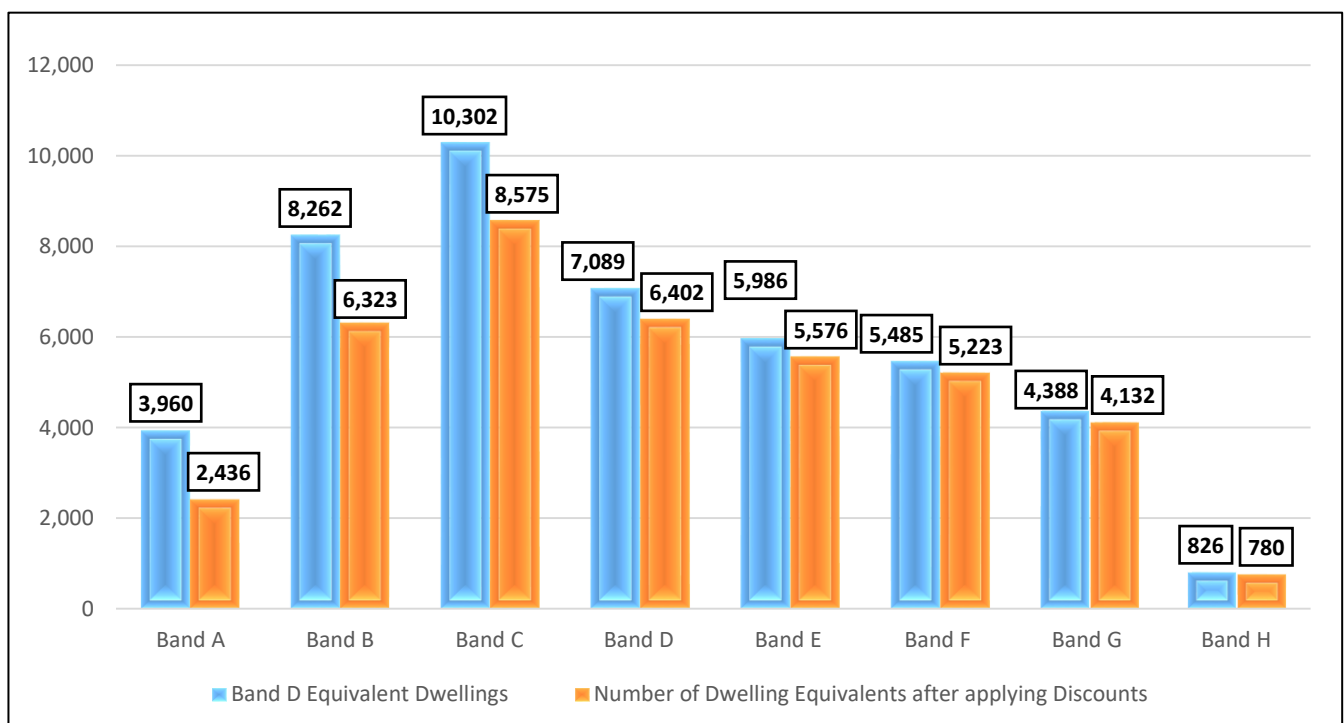
- The Band D equivalent dwellings (the dwellings in each Council Tax Band multiplied by the Band D ratio).
- The Band D equivalent dwellings are reduced by discounts such as single person discount or Local Council Tax Support and exemptions.
- A specific COVID-19 increase of **20%** for working age claimants of Local Council Tax Support has been included (a reduction from 30% assumed in 2021/22).
- An allowance is made for contributions in lieu of Council Tax for Ministry of Defence Properties.
- An estimate is made for property growth during 2022/23.
- A projection is made for non-collection/in year change of **1%**. This reflects the risks and opportunities related to in year changes in properties, exemptions and discounts together with the collection rate (the actual collection performance for all years debt was **97.74%** in 2019/20 and **95.37%** in 2020/21).

3.6 The budgeted Council Taxbase for 2022/23 at **39,695.1** is **(32.8 or 0.08%)** lower than the projection of **39,727.9** contained in the MTFs. The reasons for this projected reduction are:

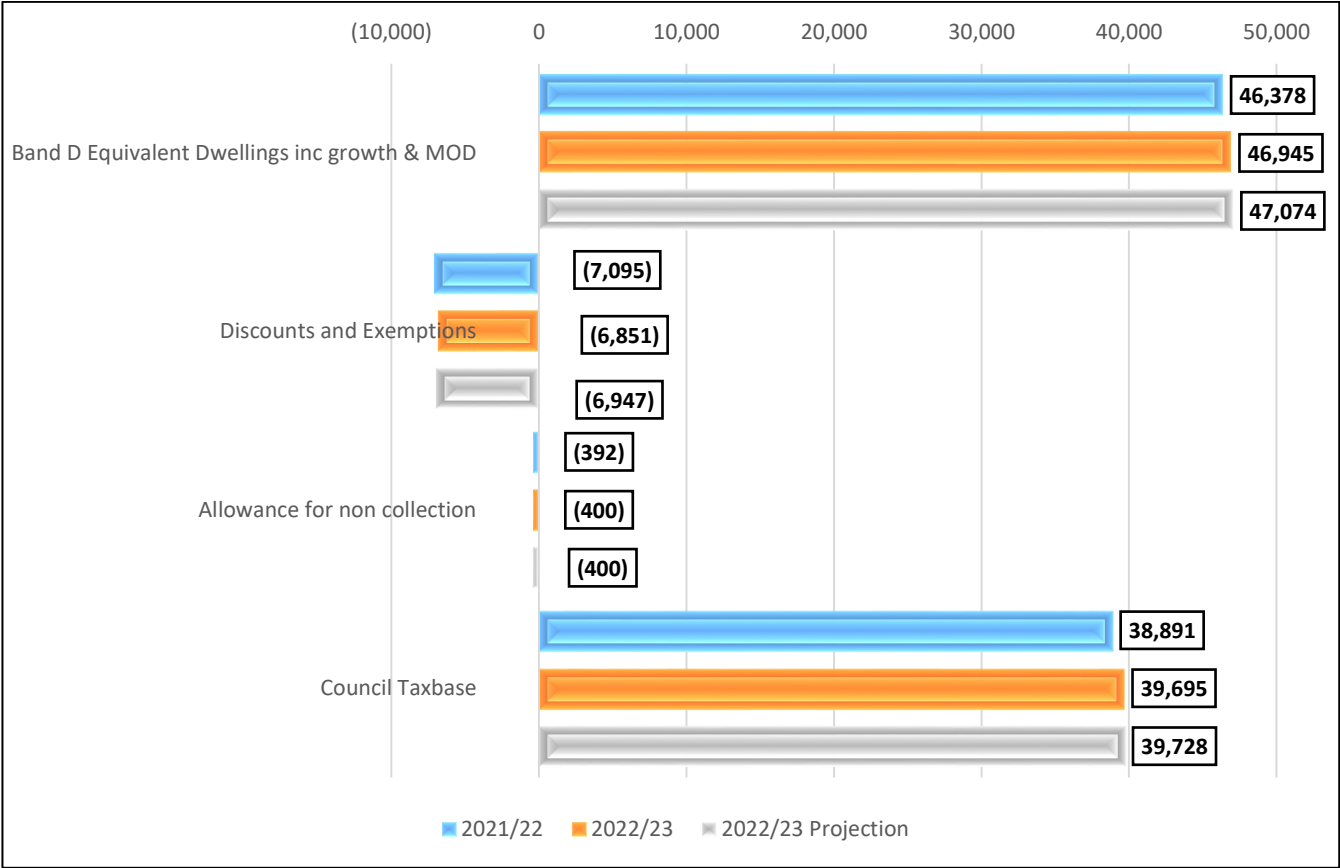
	2022/23			Comments
	Projection	Budget	Variance	
Band D equivalent dwellings	47,074.2	46,945.3	(128.9)	Projected lower property growth
Discounts and exemptions	(6,946.5)	(6,850.7)	95.8	Projected lower discounts and exemptions and an assumed 20% increase in working age claimants
Allowance for non-collection	(399.8)	(399.5)	0.3	
<b>Total</b>	<b>39,727.9</b>	<b>39,695.1</b>	<b>(32.8)</b>	

3.7 This reduction in the Council Taxbase would result in **£6,100** lower Council Tax per annum based on the approved Band D Council Tax for 2021/22 of **£185.07**.

3.8 The Council Taxbase (Band D equivalents) by Council Tax band for the District in 2022/23 prior to and after discounts and exemptions is shown in the graph below and in detail at **APPENDIX B**:

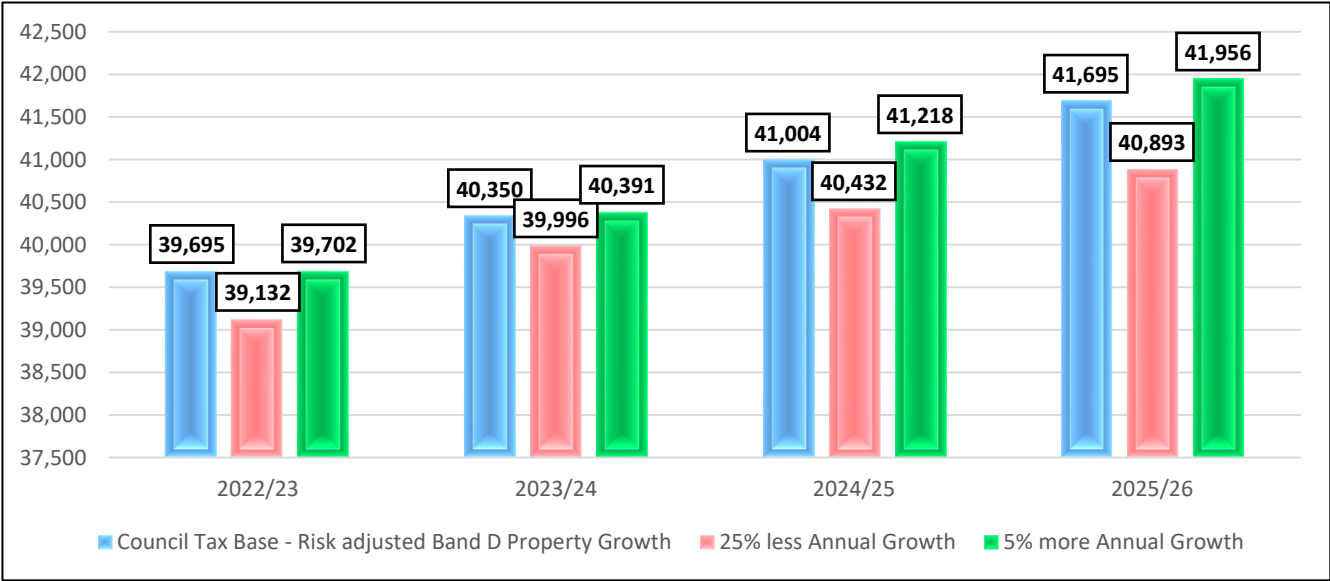


3.9 The figures in the calculation of the Council Taxbase for 2022/23 of **39,695.1** compared to the calculation for 2021/22 of **38,891.4** and the projection for 2022/23 of **39,727.9** are shown below:



3.10 The Council Taxbase will be used by this Council, Parish Councils, Staffordshire County Council, the Staffordshire Commissioner for Police and Crime and the Staffordshire Commissioner for Fire and Rescue to calculate their element of the Council Tax for 2022/23.

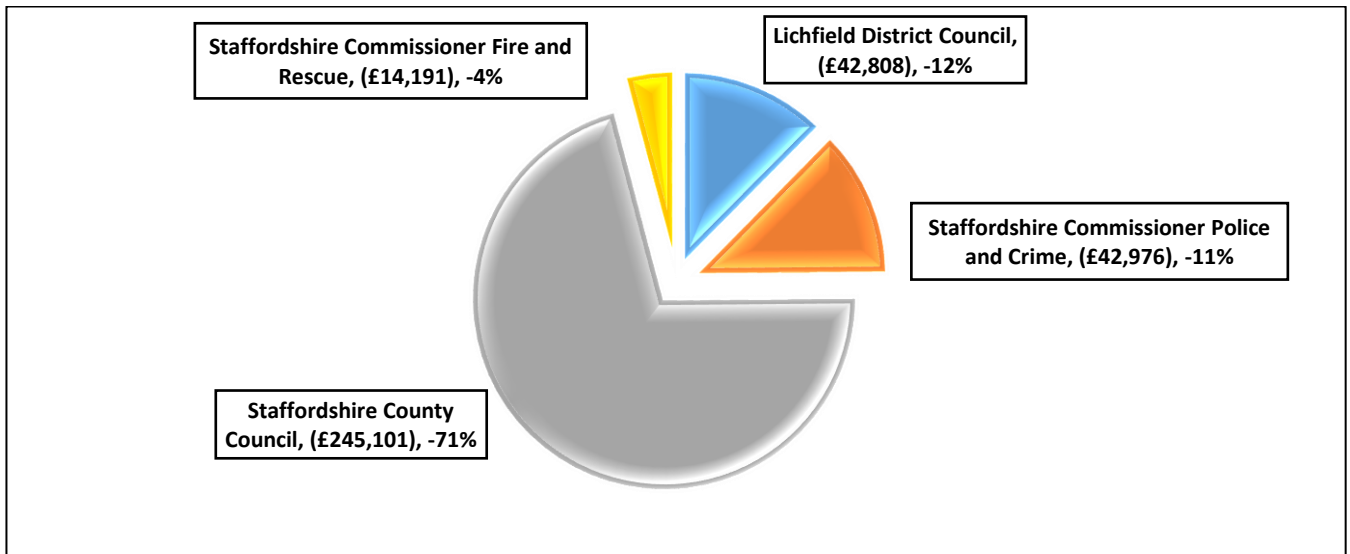
3.11 In addition, to the Council Taxbase for 2022/23, the graph below shows the Council Taxbase for 2022/23 to 2025/26. This information will be used in the Medium Term Financial Strategy for the calculation of Council Tax income.



3.12 The Council Taxbase for 2022/23 by Parish area is shown at **APPENDIX C**.

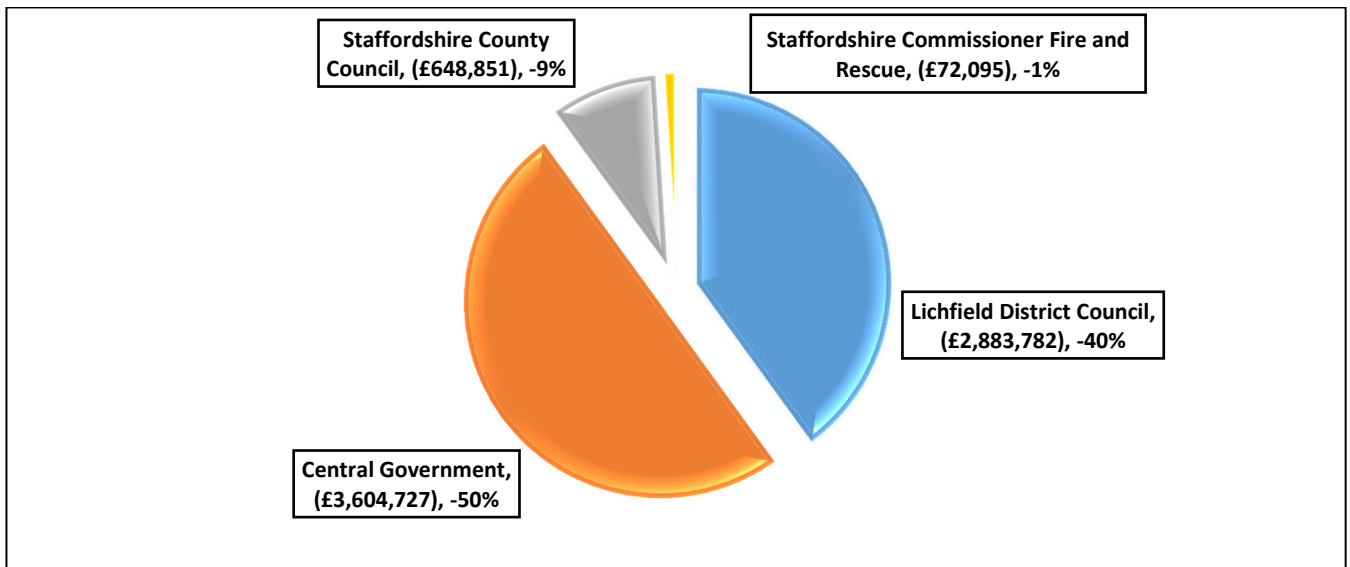
## The Projected Council Tax Collection Fund Deficit for 2021/22

- 3.13 The six months projected Council Tax Collection Fund Deficit for 2021/22 of **£345,080** is shown below (Lichfield's share of 13% includes Parish Councils):



## The Projected Business Rates Collection Fund Deficit for 2021/22

- 3.14 The six months projected Business Rates Collection Fund Deficit for 2021/22 of **£7,210,000** is shown below (Lichfield's share of 40%) with funding being provided through Section 31 grants for deficit due to the additional COVID-19 related reliefs awarded during the year:



Alternative Options	The calculation of the Council Taxbase and Collection Fund surpluses and deficits must be undertaken in line with statutory requirements and therefore there are no alternative options.
Consultation	There has been no consultation specifically about this Report due to the statutory nature of calculations.
Financial Implications	These are detailed in the background section of the Report.

Approved by Section 151 Officer	Yes
Legal Implications	No specific legal implications. The recommended changes to the Medium Term Financial Strategy not part of the approved Budget Framework will be required the approval of Full Council.
Approved by Monitoring Officer	Yes
Contribution to the Delivery of the Strategic Plan	The Medium Term Financial Strategy (MTFS) underpins the delivery of the Strategic Plan.
Equality, Diversity and Human Rights Implications	None identified in this report.
Crime & Safety Issues	None identified in this report.
Environmental Impact	None identified in this report.
GDPR/Privacy Impact Assessment	None identified in this report.

	Risk Description	Original Score (RYG)	How We Manage It	Severity of Risk (RYG)
<b>Strategic Risk SR1 – Pressures on the availability of finance may mean the Council is not able to deliver the key priorities of the Strategic Plan.</b>				
A	Decrease in the Collection rates for Business Rates (NNDR) and Council Tax.	Likelihood – Yellow Impact - Yellow Severity of Risk - Yellow	The periodic Money Matters Reports to Cabinet and Overview and Scrutiny Committee provide information on collection rates.	Likelihood – Yellow Impact - Yellow Severity of Risk - Yellow
B	The assumed level of growth included in the calculation of the Council Taxbase is not achieved.	Likelihood – Yellow Impact - Yellow Severity of Risk - Yellow	The periodic Money Matters Reports to Cabinet and Overview and Scrutiny Committee provide information on housing growth.  The MTFS assumes <b>75%</b> of projected housing growth is delivered.	Likelihood – Yellow Impact - Yellow Severity of Risk - Yellow
C	The assumed level of discounts and exemptions increases.	Likelihood – Yellow Impact - Yellow Severity of Risk - Yellow	The periodic Money Matters Reports to Cabinet and (Overview and Scrutiny Committee provide information on the projected surplus or deficit in the Council Tax Collection Fund.  The central scenario used in the MTFS assumes a <b>20%</b> increase in working age	Likelihood – Yellow Impact - Yellow Severity of Risk - Yellow

			claimants for Local Council Tax Support in 2022/23 and no specific Government financial Support.	
D	Failure to calculate the Council Taxbase and Collection Fund Surplus or Deficit	Likelihood – Green Impact - Yellow Severity of Risk - Yellow	These are calculated in accordance with the Local Government Finance Act 1992 and relevant regulations.	Likelihood – Green Impact - Yellow Severity of Risk - Yellow

### Background documents

- Local Government Finance Act 1988
- Local Government Finance Act 1992
- Local Authorities (Calculation of Council Taxbase) Regulations 1992 (as amended)
- Local Government Act 2003
- Council Taxbase (CTB) Return at October 2021
- Money Matters : Calculation of Business Rates 2021/22, Council Tax Base for 2021/22 and the projected Collection Fund Surplus / Deficit for 2020/21 - Cabinet 1 December 2020
- Money Matters: Medium Term Financial Strategy (Revenue and Capital) 2020-25 – Cabinet 9 February 2021
- Money Matters: Medium Term Financial Strategy (Revenue and Capital) 2020-25 – Council 16 February 2021
- Money Matters: 2020/21 Review of Financial Performance against the Financial Strategy – Cabinet 8 June 2021
- Money Matters: 2021/22 Review of Financial Performance against the Financial Strategy – Cabinet 7 September 2021

**Relevant  
web link**

## Provision for Housing Growth

### Actual Delivery Performance compared to the Projections

	2018/19	2019/20	2020/21
<u>Provision for Growth</u>			
Housing Completions per SHLAA	855	701	725
Risk Allowance for Non-Completions and timing differences	50%	50%	75%
Housing Completions Projection	<b>428</b>	<b>351</b>	<b>544</b>
Band D Ratio	0.90	0.90	0.95
<b>Band D Equivalents</b>	<b>385</b>	<b>315</b>	<b>517</b>

Actual Housing Completions	648	674	430
Actual Housing Completions compared to SHLAA	<b>144%</b>		

### Housing Growth Projections

	2021/22	Medium Term Financial Strategy			
		2022/23	2023/24	2024/25	2025/26
<u>Provision for Growth</u>					
Projected housing completions	737	669	732	927	980
Risk allowance for non-completions and timing differences	75%	75%	75%	75%	75%
<b>Housing completions projection</b>	<b>553</b>	<b>502</b>	<b>549</b>	<b>695</b>	<b>735</b>
Band D ratio	0.95	1.00	0.95	0.95	0.95
Band D equivalents	<b>525</b>	<b>501</b>	<b>522</b>	<b>660</b>	<b>698</b>

25% less Annual Growth
5% more Annual Growth

318	348	440	466
508	556	705	745



### The Council Taxbase Return and the Council Taxbase for the purposes of setting the Council Tax in 2022/23

	Band A Disabled Relief	Band A	Band B	Band C	Band D	Band E	Band F	Band G	Band H	2022/23	2021/22	2020/21
Total Number of Dwellings on the Valuation List	0.0	5,940.0	10,622.0	11,590.0	7,089.0	4,898.0	3,797.0	2,633.0	413.0	46,982.0	46,436.0	45,967.0
Ratio to Band D	5/9	6/9	7/9	8/9	9/9	11/9	13/9	15/9	18/9			
<b>Band D Equivalent Dwellings</b>	<b>0.0</b>	<b>3,960.0</b>	<b>8,261.6</b>	<b>10,302.2</b>	<b>7,089.0</b>	<b>5,986.4</b>	<b>5,484.6</b>	<b>4,388.3</b>	<b>826.0</b>	<b>46,298.1</b>	<b>45,708.7</b>	<b>45,191.6</b>
<u>Discounts and Exemptions</u>												
Exempt Dwellings	0.0	(103.3)	(119.8)	(183.1)	(108.0)	(68.4)	(39.0)	(45.0)	(6.0)	(672.6)	(711.0)	(617.1)
Disabled Relief	12.8	27.3	17.9	(48.0)	6.0	(3.7)	(5.8)	(35.0)	(22.0)	(50.5)	(53.1)	(54.1)
Single Person Discount - 25%	(1.8)	(545.3)	(789.3)	(856.2)	(450.8)	(294.9)	(201.1)	(162.5)	(17.5)	(3,319.4)	(3,231.4)	(3,194.4)
Discount - 50%	0.0	(5.3)	(3.5)	(1.3)	(1.0)	(3.1)	(2.9)	(9.2)	(3.0)	(29.3)	(29.9)	(30.6)
Local Council Tax Support Discount	(5.5)	(923.6)	(1,074.4)	(663.2)	(150.2)	(63.3)	(32.5)	(24.4)	(1.4)	(2,938.7)	(2,769.0)	(2,612.5)
Other Discounts	(0.3)	21.3	30.3	24.9	16.8	23.2	19.5	20.0	4.0	159.7	137.5	80.5
<b>Sub Total - Discounts and Exemptions</b>	<b>5.2</b>	<b>(1,528.9)</b>	<b>(1,938.8)</b>	<b>(1,726.9)</b>	<b>(687.2)</b>	<b>(410.2)</b>	<b>(261.8)</b>	<b>(256.1)</b>	<b>(45.9)</b>	<b>(6,850.8)</b>	<b>(6,656.9)</b>	<b>(6,428.2)</b>
<b>Number of Dwelling Equivalents after applying Discounts</b>	<b>5.2</b>	<b>2,431.1</b>	<b>6,322.8</b>	<b>8,575.3</b>	<b>6,401.8</b>	<b>5,576.2</b>	<b>5,222.8</b>	<b>4,132.2</b>	<b>780.1</b>	<b>39,447.3</b>	<b>39,051.8</b>	<b>38,763.4</b>
Contributions in Lieu (MOD Properties)										146.2	145.4	145.4
Council Taxbase Return (CTB) Taxbase										<b>39,593.5</b>	<b>39,197.2</b>	<b>38,908.8</b>
Provision for Growth										501.0	524.0	517.0
Provision for increase in working age LCTS										Included above	(438.3)	N/a
Provision for Non-Collection										(399.5)	(391.5)	(393.5)
<b>Total Council Taxbase for Council Tax Setting Purposes</b>										<b>39,695.1</b>	<b>38,891.4</b>	<b>39,032.3</b>

### Council Taxbase for the purposes of setting the Council Tax in 2022/23 by Parish Area

Parish Areas	2022/23 Apportioned Taxbase	2021/22 Apportioned Taxbase	2020/21 Apportioned Taxbase
Alrewas	1,298.70	1,248.20	1,205.00
Armitage with Handsacre	2,136.10	2,117.70	2,121.70
Burntwood	8,367.80	8,428.70	8,533.40
Clifton Campville with Thorpe Constantine	379.10	375.60	396.20
Colton	337.10	325.70	332.80
Curborough and Elmhurst and Farewell and Chorley	257.50	277.50	245.80
Drayton Bassett	464.90	445.90	444.50
Edingale	278.90	268.20	270.90
Elford	301.80	281.90	286.80
Fazeley	1,435.10	1,471.60	1,497.40
Fradley and Streethay	2,451.30	2,208.80	2,131.30
Hammerwich	1,376.10	1,339.10	1,362.40
Hamstall Ridware	164.00	152.10	149.70
Harlaston	211.40	200.40	184.60
Hints and Canwell	192.20	178.70	178.80
King's Bromley	585.60	561.70	556.30
Lichfield	12,150.20	12,110.30	12,133.00
Longdon	785.70	753.50	756.40
Mavesyn Ridware	529.20	502.50	491.00
Shenstone	3,658.00	3,461.80	3,505.90
Swinfen and Packington	160.10	151.50	147.60
Wall	203.90	199.80	200.40
Weeford	103.50	98.80	96.20
Whittington and Fisherwick	1,193.70	1,145.90	1,153.50
Wigginton and Hopwas	673.10	585.50	650.90
<b>Total Council Taxbase for Council Tax Setting Purposes</b>	<b>39,695.10</b>	<b>38,891.40</b>	<b>39,032.30</b>

## Local Plan 2040 - Submission

Cabinet Member for Economic Development, Leisure & Local Plan

Date: 7<sup>th</sup> December 2021

Agenda Item: 5

Contact Officer: Stephen Stray

Tel Number: 01543308147 / 07974617308

Email: stephen.stray@lichfielddc.gov.uk

Key Decision? YES

Local Ward All

Members



**Cabinet**

## 1. Executive Summary

- 1.1 Members will recall that at the [9<sup>th</sup> February 2021 Cabinet meeting](#), members approved the Publication (Regulation 19) version of the [Local Plan 2040](#) for formal consultation purposes and submission thereafter. This report notes the 718 representations received from 213 representors to the consultation that took place between the 5<sup>th</sup> July 2021 and the 30<sup>th</sup> August 2021. All representations made during the Regulation 19 consultation period (Appendix A) are passed to the Inspector appointed by Government to examine the Local Plan for them to consider as part of the Examination in Public following the submission of the plan.
- 1.2 Since the consideration of the February 2021 report, pandemic restrictions have been lifted and therefore evidence collection in non-restrictive conditions has been able to be progressed. Moving forward, the Local Plan 2040 and its evidence base can and will be tested at the Examination in Public. Given this context it is considered the plan can now be submitted. Submission by December 2021 would ensure the Council has met the commitment required by the inspector to commence an early review of the [Local Plan Strategy](#) (2015) and accepted by the Council as set out in the adopted [Local Plan Allocations](#) Development Plan Document (2019).
- 1.3 Attached to this report at Appendix B is a list of minor modifications to be submitted alongside the plan in the interests of ensuring clarity and accuracy.
- 1.4 This report also seeks delegated authority for the Cabinet member for Economic Development, Leisure & Local Plan in consultation with the Head of Economic Growth and Development to agree:
  - A Regulation 22 Statement which sets out how the Council has complied with its statutory consultation requirements. A draft for informational purposes is attached at Appendix D and will be updated to take account of the Cabinet meeting decision and minutes using the delegated powers requested.
  - Sign off on an overall Duty to Cooperate Statement for submission and individual Statements of Common Ground (SoCG) with other neighbouring authorities and other statutory bodies prior to submission and or in the lead up to and during the Examination in Public in the interests of expediency. A draft for informational purposes of the overall Duty to Cooperate Statement is attached at Appendix E and a template for the Individual Statements of Common Ground is attached at appendix F.

## 2. Recommendations

- 2.1 That Cabinet approve the [Local Plan 2040](#) and accompanying [Proposals Map](#) for submission to the Planning Inspectorate (previously the regulation 19 version considered at 9<sup>th</sup> February 2021 Cabinet), together with the summary comments and officer responses at Appendix A and the list of minor modifications at Appendix B in the interests of clarity.
- 2.2 That delegated authority is given to the Cabinet Member for Economic Development, Leisure & Local Plan in consultation with the Head of Economic Growth & Development and the Leader of the Council

agree the finalised Regulation 22 – Statement of Consultation, the overall Duty to Cooperate Statement and individual Statements of Common Ground (SoCG) in the interests of expediency.

### 3. Background

- 3.1 The Local Plan 2040 sets out the Council's strategic policies, including the levels of development to be delivered to 2040 (and sites to deliver these requirements), and a suite of 'Local Policies' which are principally focussed on development management issues relevant to the determination of planning applications. The plan and the specific policies and proposals it contains can be viewed at [Local plan 2040 \(lichfielddc.gov.uk\)](http://lichfielddc.gov.uk).
- 3.2 Members will recall Cabinet approved the Publication (Regulation 19) version of the Local Plan for formal consultation purposes at its meeting on the 9<sup>th</sup> February 2021 and its submission thereafter. Due to the ongoing pandemic restrictions at the time, the report to the publication (regulation 19 version) delegated precise details of the consultation strategy and its timing to be agreed with the relevant Cabinet member in conjunction with the Head of Economic Growth & Development. The report also included a safeguard that the Local Plan 2040 publication document would be brought back before Cabinet if some remaining on-going evidence gathering indicated the need for significant changes to the Local Plan or that work itself could not be progressed further due to the pandemic and the implications for the Local Plan needed to be reported back.

#### The outcome of the Consultation

- 3.4 Formal consultation took place over 8 weeks between the 5<sup>th</sup> July 2021 and the 30<sup>th</sup> August 2021. Due to the pandemic restrictions in place at the time, the consultation strategy involved a letter / email circulation from records held on the Council's database and a combination of physical meetings with Covid secure measures in place and virtual consultation methods including using a presentation video and the offer of virtual drop-in sessions. Officers were also available throughout the consultation period via phone and email to assist with queries.
- 3.5 The Regulation 19 consultation is a statutory consultation and asked whether the plan was considered to be legally compliant and whether the tests of soundness as required in the National Planning Policy Framework have been met and then asks for representors to set out how the plan should be amended with justification for any such changes. A copy of the standard proforma which consultees were asked to complete can be found at Appendix C.
- 3.6 Appendix A summarises all of the 718 representations that were received from the 213 representors in response to the consultation together with summary officer responses. It should be noted that only a modest number of submissions, particularly from professional planning organisations followed the proforma. Most submissions, particularly from the general public did not complete the proforma by answering the questions posed but instead made comments as they saw fit in support or opposed to the plan. In such circumstances it would not be appropriate for officers to second guess the categorisation and so Appendix A in such circumstances simply registers the question as unanswered. However, this does not preclude the comments being valid for examination purposes and they will be forwarded on to the Inspector in full for their consideration. Where the questions have been answered, Appendix A captures whether the representation related to Duty to Cooperate, Legal Compliance or to Soundness. The vast majority of the representations will relate to tests of soundness. At this stage in proceedings, all of the representations received will be submitted with the Plan to the Planning Inspectorate for consideration at the Examination in Public. All representations can be viewed in full via the Council's [consultation portal](#).
- 3.7 Five representations were received after the close of the consultation period. These have been summarised and a summary officer response prepared and are set out at Appendix G. Late responses will

be submitted to the appointed planning inspector alongside all those responses made prior to the close of the consultation. It will be for the planning inspector to determine whether to consider such responses.

- 3.8 Following the regulation 19 consultation and in response to the comments received, a list of minor modifications to the plan have been identified at Appendix B. It is proposed that this list is submitted to address factual corrections and any spelling and grammatical errors noted by the representations received.

#### Evidence base

- 3.9 Since the consideration of the February 2021 report, pandemic restrictions have been lifted and therefore transport evidence collection in non-restrictive conditions has been able to be progressed during the Autumn. Moving forward, the Local Plan 2040 and its evidence base can and will be tested at the Examination in Public. Given this context it is considered the plan can now be submitted.

#### Regulation 22 Statement, Duty to Cooperate Statement and Local Plan 2040 Submission

- 3.10 A Regulation 22 Statement setting out how Lichfield District Council has engaged with the community and stakeholders in preparing the plan and how this meets the requirements of the Statement of Community Involvement (SCI) and national regulations will be submitted with the plan. It is a requirement of the regulations that the Council sets out how it has undertaken this work when it submits the Local Plan. The Regulation 22 Statement can only be completed after the decision of Cabinet on the 7<sup>th</sup> December so that it captures the reporting undertaken. A draft Regulation 22 Statement can be found at appendix D.
- 3.11 The plan when submitted will be accompanied by a Duty to Cooperate Statement demonstrating how Lichfield District has worked with neighbouring authorities and other statutory bodies in the preparation of the submission version of the plan. The Duty to Cooperate is a legal and soundness test that requires cooperation between local planning authorities and other prescribed bodies to maximise the effectiveness of policies for strategic matters in Local Plans. Under Duty to Co-operate requirements, the Council is preparing an overall Duty to Cooperate Statement on the work it has undertaken with neighbouring authorities and other prescribed bodies on cross boundary strategic issues. A draft for informational purposes is attached at Appendix E. Individual Statements of Common Ground are also being finalised for submission following analysis of the representations received from relevant bodies at the regulation 19 consultation stage and subsequent discussions. A template for the individual Statements of common Ground is attached at Appendix F for informational purposes. The Statements of Common Ground will cover matters such as housing, Infrastructure and the environment. A finalised Appendix E will be submitted alongside the Local Plan 2040 by the end of December 2021 to reflect an updated position on the Statements of Common Ground that have been agreed and which will also be submitted.
- 3.12 It is recommended that delegated authority is given to the Cabinet Member for Economic Development, Leisure & Local Plan in consultation with the Head of Economic Growth & Development and the Leader of the Council to agree the finalised Regulation 22 – Statement of Consultation, the overall Duty to Cooperate Statement and individual Statements of Common Ground (SoCG). This approach is consistent with the approach undertaken by other authorities we will be entering into Statements of Common Ground with. It ensures such technical requirements for submission are dealt with expediently prior to plan submission as discussions continue and subsequent to submission, should it become apparent in the lead up to and during the Examination in Public that amendments to or further Statements of Common Ground are required.

#### Local Plan Submission

3.13 The Plan will be submitted by the end of December 2021 together with its evidence base and relevant appendices. This submission date reflects a commitment made to the Planning Inspectorate in its consideration of the now adopted Local Plan Allocations DPD (2019). Policy LPR: Local Plan Review at paragraph 2.3 page 11 of the adopted Local Plan Allocations document sets out the requirement. This submission timescale also accords with the timetable set out in the Council's Local Development Scheme (LDS) which the inspector for the Examination in Public will take into consideration.

Alternative Options	<ol style="list-style-type: none"> <li>1. To not submit the plan. This would result in the plan going back to an earlier stage of progress and would delay the plan making process. The Council would not be in accordance with its' published Local Development Scheme and will not have addressed the commitment made when the Local Plan Allocations document was adopted. The decision could lead to a significant amount of the evidence base work becoming out of date with additional financial implications for subsequent updating of the evidence. There is an increased risk that planning proposals will be submitted and would be approved on appeal if refused as time progressed and the existing adopted Development Plan was found to be time expired.</li> <li>2. To delay submission. The Council would not be in accordance with its' published Local Development Scheme and will not have addressed the commitment made when the Local Plan Allocations document was adopted. The decision could lead to a significant amount of the evidence base work becoming out of date with additional financial implications for subsequent updating of the evidence. There is an increased risk that planning proposals will be submitted and would be approved on appeal if refused as time progressed and the existing adopted Development Plan was found to be time expired.</li> </ol>
Consultation	<ol style="list-style-type: none"> <li>1. Consultation has been undertaken on the previous stages of the Local Plan Review.</li> <li>2. The Regulation 19 Publication version of the Local Plan was consulted upon between the 5<sup>th</sup> July 2021 and the 30<sup>th</sup> August 2021. All representations received during the Regulation 19 consultation will now be submitted to the Planning Inspectorate as part of the Examination in Public. It should be noted that as such representations are, as required by the regulations are made to the Inspector and the District Council has not responded back to each representor.</li> </ol>
Financial Implications	<ol style="list-style-type: none"> <li>1. The District Council is required to enter into a Service Level Agreement with the Planning Inspectorate and pay their fees for undertaking the Examination.</li> <li>2. The District Council is required to appoint an Independent Programme Officer to manage the administration of the Examination in Public</li> <li>3. There is an earmarked reserve set aside for the Local Plan examination and review costs at 1 April 2021 of £257,000. At present, taking into account committed costs, £171,000 remains available to fund legal advice, a</li> </ol>

	programme officer and the fees of the planning inspectorate and any additional work that the Inspector may recommend to the Council it undertakes in order for the plan to be found sound.
Approved by Section 151 Officer	Yes
Legal Implications	<ol style="list-style-type: none"> <li>1. There is a statutory duty for the Local Authority to prepare a Local Plan and to review and keep it up to date by review at least every 5 years.</li> <li>2. The Local Plan is required to be submitted in accordance with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012</li> </ol>
Approved by Monitoring Officer	Yes
Contribution to the Delivery of the Strategic Plan	<ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>3. Supports the priority of 'Developing Prosperity' through the Local Plan preparation which makes provision for land use allocations including employment and residential use, thereby encouraging economic growth, enhancing the district and providing certainty for investment.</li> <li>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.</li> </ol>
Equality, Diversity and Human Rights Implications	<ol style="list-style-type: none"> <li>1. An Equality Impact Assessment has been undertaken at all previous stages of the Local Plan Review process including the Regulation 19 Publication version of the plan which is to be Submitted to the Planning Inspectorate.</li> </ol>
Crime & Safety Issues	<ol style="list-style-type: none"> <li>1. There are no crime and safety issues.</li> </ol>
Environmental Impact	The Council is required to assess the environmental impacts of any plan which it produces. Accordingly, a Sustainability Appraisal Scoping report accompanied the Issues & Options version of the plan and a Sustainability appraisal appropriate to each stage of the plan has subsequently been published including at the Regulation 19 Publication plan stage. The Council has also published a Habitat Regulations Assessment at each relevant consultation stage including the regulation 19 Publication stage. These evidence base documents will be tested at Examination.
GDPR / Privacy Impact Assessment	A Privacy Impact Assessment into the plan has been undertaken



	Risk Description & Risk Owner	Original Score (RYG)	How We Manage It	Current Score (RYG)
A	Objections from omission site promoters results in changes to the plan	Likelihood: Red Impact: Yellow Risk: Red	Use evidence base and prepare topic papers and hearing statements for consideration at examination to provide additional narrative for Local Plan strategy and site selection to counter objections made during the Reg 19 consultation.	Likelihood: Green Impact: Yellow Risk: Yellow
B	Objections from neighbouring authorities re the quantum and location of development result in changes to the plan	Likelihood: Red Impact: Yellow Risk: Red	Under the Duty to Cooperate and undertake meetings and agree SoCG. Use evidence base and prepare topic papers and hearing statements for consideration at examination to provide additional narrative for Local Plan strategy and site selection.	Likelihood: Green Impact: Yellow Risk: Yellow
C	Objections from statutory consultees re the quantum and location of development result in changes and or delay to the plan	Likelihood: Red Impact: Red Risk: Red	Under the Duty to Cooperate, undertake meetings and agree SoCG. Use evidence base and prepare topic papers and hearing statements for consideration at examination to provide additional narrative for Local Plan strategy and site selection.	Likelihood: Green Impact: Red Risk: Yellow
E	Submission doesn't meet statutory requirements and results in delay	Likelihood: Yellow Impact: Red Risk: Red	Use PAS & PINS templates and use Counsel for best practice advice as a checklist for submission.	Likelihood: Green Impact: Red Risk: Yellow

	<b>Background documents</b> <a href="#">Agenda for Cabinet on Tuesday, 9th February, 2021, 6.00 pm (lichfielddc.gov.uk)</a> - Agenda item 3
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	<b>Relevant web links</b> <a href="#">Agenda for Cabinet on Tuesday, 9th February, 2021, 6.00 pm (lichfielddc.gov.uk)</a> - Agenda item 3 <a href="#">Local plan 2040 (lichfielddc.gov.uk)</a> <a href="#">Evidence base (lichfielddc.gov.uk)</a>
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Representation Ref (LP2040 X).	Consultee/Agent	Section	Duty to Cooperate	Legally and procedurally Compliant?	Is the plan sound? (inclusive of positively prepared, justified, effective and compliance with NPPF)	Does the respondent suggest changes	Does the respondent wish to appear at EiP	Comment Summary	Changes Required	Officer Response
LP2040 1	Clare Parslow	Policy SHA2	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	Opposed to proposed allocation at Fazeley. Concerned over the loss of wildlife and natural habitats in the area. 800 homes will bring more people and more cars, the roads within the area are already under strain. Mile Oak is a beautiful village with lots of green fields and tress surrounding it - to destroy this will destroy the village. Primary school will be unable to cope with the influx of new children, doctors and dentist surgeries are at breaking point.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes policies relating to the protection and enhancement of the natural environment.
LP2040 2	Anonymous	14.25	No	No	No	No	No	[LDC Note: Representation submitted anonymously due to fault in consultation system settings. Fault corrected once anonymous representation submitted] This is green belt on the edge of Tamworth. Surely there are brown field sites that can be used that doesn't mean this area be ruined.	No changes required.	Local Plan 2040 is supported by extensive evidence base, including evidence relating to the availability of brownfield sites. Site is selected having regard to evidence base in Green Belt study and because exceptional circumstances exist to meet identified housing need.
LP2040 3	Anonymous	Policy SHA2	No	No	No	No	No	[LDC Note: Representation submitted anonymously due to fault in consultation system settings. Fault addressed once anonymous representation submitted] No comment provided.	No changes required.	Not applicable.
LP2040 4	Anonymous	14.3	No	No	No	No	No	[LDC Note: Representation submitted anonymously due to fault in consultation system settings. Fault addressed once anonymous representation submitted] No comment provided.	No changes required.	Not applicable.
LP2040 5	Anonymous	14.4	No	No	No	No	No	[LDC Note: Representation submitted anonymously due to fault in consultation system settings. Fault addressed once anonymous representation submitted] No need to expand housing. The area is fine now.	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence.
LP2040 6	Bryan Gibbons	Whole document	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	Where are the timescales to indicate development, it would be helpful to know ow what projects have been approved or submitted for development within the next 10 years. I see no mentioned of improved transport infrastructure need to cater for massive hosing development to the south of Lichfield. Where will this all end?	No changes required.	Appendix A of the Local Plan 2040 sets out a trajectory of the anticipated delivery of housing for the plan period. Local Plan 2040 is supported by an evidence base, including evidence relating to housing supply. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Housing developments to the south of Lichfield city relate to allocations from the adopted local plan which are to be saved through the Local Plan 2040.
LP2040 7	Sarah Cunningham	Housing chapter	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	Don't understand why there is provision for travellers within the plan and data dates back to 2012 so suggest this is out of date and the policy needs to be reviewed. Provision for infilling should be removed as there are many examples of how this has a negative impact upon society and health. Is the latest data for provision of housing correct, the report was started in 2018 ands the worked has changed since then. is there a requirement for these houses or should this be reviewed?	No changes required.	Local Plan 2040 seeks to plan for the Councils established accommodation need for gypsies and travellers in accordance with national policy and guidance and the plan's supporting evidence. Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence
LP2040 8	Louise Branch	Whole document	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	Disagree with the local plan. It is a complete nonsense. Roads within the area have bad junctions which become gridlocked. New homes are not for local people as most new houses are bought to let. How does this help Lichfield? The price at local train stations stops them being fully used. Shenstone does not have a thriving village hub - a library people cannot use, most people travel out of the area to work. Flooding needs to be addressed in the area. Road links to Lichfield are gridlocked, roads are in a terrible state. Lichfield City Centre is dead. It fails to provide facilities to meet most groups of people. Leisure facility are poor. the recycling centre is a disgrace. Every page of the plan has an inaccurate, incorrect, out of date statement. The plans are destined to fail.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period.
LP2040 9	Lewis & Julie Perry	Policy SHA2	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	Disappointment with the way consultation has been publicised, found out through neighbours. Consultations held during a week day in working hours which makes it difficult to attend. It is believed that the consultation has been organised this way to 'get it done' rather than actively engaging with residents. At an earlier consultation event it was difficult to obtain relevant information, information was not free flowing from representatives there. The whole story is not being told with the consultation - 800 homes in Mile Oak area are mentioned, but the LP does not mention the 750 houses currently planned and being built on Dunstall Lane. It is felt that this is misleading as people may not understand the disruption from the volume or houses and congestion that will come with it. Looking at the Lichfield District Rural Planning Project dated 2011, section 84 talked about the proposed site west of Mile Oak and Sutton Road and how it would be distanced from the principle area of facilities and services and would promote dispersion of the community. The Sustainability Assessment carried out in Oct 2019 outlined the need to protect, enhance and manage the character and quality of the landscape and townscape to maintain local distinctiveness and sense of place. The development in the LP would go against this and would create a separate community isolated by distance and road/natural obstacles from Town Centre and from Fazeley. The development will resort to more use of cars as the development is not close to amenities. There would also be further impact on congestion as people will need to drive to the train station, particularly at peak commuting times. This development is not sustainable. LDC requires 7300 homes for own projected needs and a further 4500 for Greater Birmingham (GB) and Black Country (BC). There must be plenty of brownfield and greenfield sites in GB and BC that are in need of development rather than to lose Green belt areas forever in the district. Exponential increase in road congestion in Fazeley and Mile Oak, there are already localised problems within this area with traffic coming into and out of Tamworth via this part of Tamworth, the development would only exacerbate the traffic issues. with the development a further 3000 cars will be on the local roads. This could also negatively impact Ventura Park making it difficult for locals and visitors due to congestion, this would be at odds with sustainability statements made. Although new primary school provision is mentioned, there is no mention of doctors surgeries, clinics, new secondary school which are needed to cope with this development. The closest school is the Rawlett Schools, so school age children will have to catch a bus or get lifts. There will be a stretch on local services such as policing, fire and hospitals also due to the development. The size of the development will dwarf the existing Mile Oak and Bonehill estates which will destroy the character of the local community and be at odds with maintaining and strengthening the local distinctiveness and sense of place. The Rural 2011 Planning Project talked about 700 homes, now the figure has risen to 800. This can only mean that the homes and public and private green spaces will be heavily concentrated town style houses, this will not enhance the quality and character and townscape, there will also be a loss to wildlife. Another concern is drainage, the HS2 works on the A453 Drayton Bassett road has already resulted in local flooding, this work however is small in comparison to the proposed development of 800 houses.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes policies relating to the protection and enhancement of the natural environment. Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. The consultation was carried out in accordance with the Council's adopted Statement of Community Involvement (SCI). Approach to consultation was in excess of those set out in the SCI and was agreed with portfolio holder. This included a range of online resources, emails and/or letters to all registered consultees who have requested to be notified, five in-person 'drop in sessions held across the District, officer availability via phone and/or email five days a week during the consultation. Local Plan 2040 has been subject to four rounds of public consultation including two additional consultations not required by regulation.
LP2040 10	Louise Branch	1.10	Yes	Unanswered	Unanswered	Unanswered	Unanswered	No comment provided.	No changes required.	Not applicable.
LP2040 11	A Smith	Whole document	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	Object to the local plan. Very few jobs available in the area - where are new residents expected to work? Have lived in an area previously which has been over developed. Previously pleasant towns have been ruined because infrastructure is never upgraded to accommodate extra traffic of people. Don't care about sustainability of climate change hoax especially as the economy has been sunk by the government.	No changes required.	Local Plan 2040 identifies sufficient land to provide for the District's employment land requirements. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period.

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LP2040 12	Burntwood Action Group - action group prepared standardised representation - Submitted by 2 individuals	Burntwood	Unanswered	Unanswered	Not effective	Unanswered	Unanswered	There is no supporting evidence within the plan that both Birmingham and the Black County cannot find enough land to meet their requirements and sufficient brownfield land is available in both conurbations. No supporting evidence regarding how road traffic congestion caused by commuters to Birmingham and the Black County will be managed. No supporting evidence of how rail transport links and parking will be improved to enable public transport travel between Lichfield District and Birmingham and the Black Country. No supporting evidence for the need to remove land from the Green belt around parts of Burntwood. Transferring land from Green Belt status to safeguarded status puts it at significant risk from developers whenever the local plan is reviewed - usually every 3-5 years.	No changes required.	established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 does not include proposals to remove land from the Green Belt around Burntwood. Local Plan 2040 does not include proposals to designated safeguarded land within the District.
LP2040 13	Pam Beale	Natural Resources	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	Want to understand why there is no reference to HS2 within this section and few references throughout the Local Plan. Section talks about protecting ancient woodland and biodiversity and not allowing development in places where this might be endangered and yet in parts of the District HS2 is destroying ancient woodland and affecting habitats. HS2 development will release thousands if not millions of tonnes of carbon and yet you will receive little compensation from HS2. I could not see reference to low carbon/net zero house building either.	No changes required.	Local Plan 2040 indicates the route of HS2 on its accompanying policies maps and references this throughout the document. HS2 project is dealt with under its own separate legislation. Local Plan 2040 includes policies relating to the protection and enhancement of the natural environment.
LP2040 14	Alan Evans & Mai Dunn	Policy SHA2	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	The proposed development will have a massive impact on my property, the road is busy with large goods vehicles, emergency services and everyday vehicles. Having the proposed 5000 homes plus shops and potentially a school running off the road is going to cause an immense amount of noise, chaos and become an unpleasant area to live and devalue the pre-existing properties. Main issue is that the area is in Tamworth however Lichfield Council decide what happens with the Green Belt. In my opinion this is unacceptable. The development will have any impact on any resident living in Lichfield so why do their Council decide what happens to Tamworth residents.	No changes required.	Local Plan 2040 proposes the allocation SHA2 for 800 dwellings in this allocation. Allocation is within Lichfield District Council's administrative area as is the settlement of Fazeley, Mile Oak & Bonehill. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate.
LP2040 15	Diana White	Whole document	No	No	No	Unanswered	Unanswered	Legal test requires cooperation with local planning authorities, not certain that adequate consultation with relevant parties has taken place. Legal requirement to conduct traffic survey in 2020. Staffs County Council did not do this. This may not be legal. Was consideration given to the fact that HS2 is taking place. Considerable additional traffic chaos with a simultaneous development taking place. 800 homes in the ward (Fazeley) is putting strain on infrastructure, local amenities and resources which are already overstretched or at capacity including High Schools. 800 homes is completely disproportionate with the current distribution of dwellings in the Parish.	No changes required.	authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.
LP2040 16	Anthony Miles	Policy SHA4	No	No	No	Yes	Yes	The plan does not consider or involve local residents who will be directly affected and how immediate local residents needs can be integrated into the plan to deliver a sustainable solution for an aging population. The plan discusses and outlines the strategy for development and growth in Whittington and how local services will be maintained. Does not outline how it will affect immediate local residents. With this development there is an opportunity to improve the current infrastructure issues currently happening on Back Lane. The issue being 'on road' parking and vehicles not being able to pass through due to cars being parked all over the road. Integration of the current settlement into the design and infrastructure of the new development will not only solve the current parking issues but meet the requirements of ensuring the development and infrastructure improvement will provide a sustainable living for an ageing population. I would like to see included in the design strategy: firm commitment to design and development which minimises the negative impact on immediate local residents and integrates the immediate local settlement into the design.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. Local Plan 2040 includes policies relating to design and the requirements to ensure homes are suitable across lifetimes.
LP2040 17	Whittington Neighbourhood Group (Gareth Hyde)	Policy SHA4	Yes	Yes	Yes	Yes	No	Document appears to be a re-affirmation of the existing plans assumptions including reference to Whittington and Fisherwick. This 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 SHA4 in addition to sites within the existing settlement boundary. Land at Huddlesford Lane has been introduced into the plan even though proposals for the site we refused planning permission some years ago. In common with other sites considered concerns have previously been raised. In particular serious issues relating to vehicular access arrangements for the site. Site is located on Green Belt. Parish Council's concerns may be summarised as follows: Huddlesford Lane is extremely narrow making access hazardous and impractical. Although site boundaries would be defined by existing hedgerows it is not contiguous with the existing village edge and development here would impact on inward views toward the village. Although the NPPF and Local Plan stress the importance of preserving and enhancing pedestrian networks these could be subsumed unless very clear planning safeguards are put in place. Recent discussions with Richborough Estates have gone some way to meet these concerns. Proposals also include some communal parking for use but the existing housing development adjacent to the proposed developments. Residual concerns still remain. Density of 38 dwellings per hectare could make compliance with NPPF criteria on maintaining the openness of Green Belt land difficult to achieve. Also suggested that consideration be given to adopting the Back lane site instead of Huddlesford Lane, for reasons which remain unclear the site was discounted. I would still maintain it would be the least disruptive of all the sites.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. SHA4 was included within the Preferred Options document.
LP2040 18	Elaine Key	Policy SHA2	No	No	No	Yes	No	When preparing local plans there is a need to balance the wishes of local residents and protect natural environment – which in this case we consider feel hasn't been fulfilled. Consider that the infrastructure for another 800+ houses could not be put in place to cope with this development. Do not consider that consultation with all the relevant people/parties has taken place It would appear to be a case of Lichfield DC fulfilling their housing numbers in an area which is barely within their boundary and using the infrastructure of neighbouring Tamworth. Traffic Survey by Staffs CC should have been carried out in 2020 but they used the figures used on 2019 survey with a percentage increase added, needs to be clarified if further surveys will take place.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.
LP2040 19	Kevin Talbott	SHA2	Unanswered	Unanswered	Unanswered	Yes	Unanswered	Real concerns with regard to 800 houses at Mile Oak Tamworth. Been a resident for 24 years, over the last few years the population has grown massively, do has the noise level and pollution level. The rise of Ventura has not helped, various people have been travelling from outside areas to shop. The result has caused ridiculously high levels of traffic in Mileoak, particularly at Mileoak traffic lights. A further 800 new houses in the same area, will generate an extra 1600 cars (assuming 2 cars per household). How are cars going to get about with no new infrastructure? Gone are the days where I used to sit in my garden and enjoy the peace and quiet. The noise of the A5 Bypass is like living next to a motorway, particularly with the rise of Dordon as an individualised area. The rise of online deliveries are also causing a nightmare for the area. A higher population will make things worse. A huge housing estate has been built near the Bonehill bridge near Ventura which is nearly reaching Mileoak. Another housing estate in Mileoak will be unsustainable for local residents. Over the past 3 years flooding is becoming an issue. Wildlife will be killed off with the 800 homes. Profits are being put before wellbeing.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.

Representation Ref (LP2040 X).	Consultee/Agent	Section	Duty to Cooperate	Legally and procedurally Compliant?	Is the plan sound? (inclusive of positively prepared, justified, effective and compliance with NPPF)	Does the respondent suggest changes	Does the respondent wish to appear at EIP	Comment Summary	Changes Required	Officer Response
LP2040 20	Diane Wells	SHA2	Unanswered	Unanswered	Unanswered	Yes	Unanswered	Object to the 800 houses proposed in the Fazeley ward under soundness and compliance with other local authorities. The District point of view is quite powerful, there appears to be no consideration for the wards position in the larger community. This district or ward is not isolated like others where you plan development, in fact it is so close to neighbouring Tamworth on the map it appears as an extension to it and the current residents utilise all amenities in the town and not the city of Lichfield. It will be unsustainable for more development. Traffic congestion - Watling Street, Fazeley Road and Mile Oak junction are major routes for traffic, not only in the ward but arterial roads for commuters. There is no other infrastructure proposal as LDC treat the area as 'rural' a misdemeanour to do so. It is mentioned about providing small local services for the community but the emphasis is on the adjacent out of town provision which is already much over subscribed and will be using the same roads for access adding to traffic congestion and air pollution. Education - school provision is mentioned but not a secondary school. Rawlett school which serves Fazeley is not able to cope with increased numbers. Medical - the only doctors surgery in Fazeley already copes with Tamworth patients, the area is poorly served in terms of medical services. The overall area and patients would be poorly served by medical services and patients would be registering with Tamworth's doctors. The LP mentions the Robert Peel hospital but there is no A&E and the provision is only a skeleton service like x-ray, physiotherapy and limited occasional clinics to serve the population of Tamworth. There is no decent hospital provision in an area which has a large population that has to be serviced outside this area. This proposal it far too large to integrate into the existing infrastructure and disproportionately enlarges the existing community which is dependant on Tamworth for major services. How can this development be considered without the basic needs for health and education provision, road infrastructure. This is a throwback to poor provision and planning of the 1960's and 70's.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.
LP2040 21	Paul Cornhill	Whole document	No	Yes	No	Yes	No	LDC has almost been obstructive in their dealings with residents in areas affected by the proposals. The process has not been positively prepared because the attitude to those affected and allowed to comment have been totally negative with Lichfield residents on the edge of Tamworth and the impact on Tamworth utilities, facilities and infrastructure. Lichfield and Tamworth are not Greater Birmingham and this is a proposal for creating a Greater Birmingham conurbation. The plan is extremely effective at upsetting residents and kowtowing to Birmingham City Council. Government is bringing in protections for Green Belt land in order to comply with climate change therefore it is not consistent with national policy which is in flux. By the time the proposal is brought to fruition it will be illegal. Proposals need to be redrafted so that all Green belt land is removed to comply with the needs for zero Carbon.	No changes required.	Local Plan 2040 has been subject to three previous rounds of public consultation prior to the regulation 19 consultation. All consultations have been conducted in accordance with the Council's adopted Statement of Community Involvement. Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence.
LP2040 22	Robert Summerfield	Figure 3 North of Lichfield Strategic Housing Allocation	No	Unanswered	No	No	No	Propose 1.6 hectare site for allocation. Land borders directly onto the planned development of 750 homes at Curborough and will border the proposed Local Plan development meaning the land will be totally engulfed by housing developments. As willing landowners we were not aware of the call for sites and wish the site to be considered at this stage. In the test of soundness and fairness, the land we are asking too be included would make for a more uninterrupted development, allowing for comprehensive delivery of housing.	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence.
LP2040 23	Clive Pearson	3.13	Yes	Yes	Yes	No	No	Whittington village needs more housing to encourage younger people to remain in the village and also encourage new residents to allow the sustainability of the village	No changes required.	Supported noted. Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Local Plan 2040 includes proposed allocation SHA4 at Whittington as part of it's spatial strategy.
LP2040 24	Alan Duncan	Whole document	No	No	No	No	No	No comment provided.	No changes required.	Not applicable.
LP2040 25	Martin Horner	Whole document	No	No	No	No	N/A	Do not consider that a full consultation has been undertaken. Traffic surveys have not been undertaken and only use estimated figures. Concerns regarding cumulative impact of proposed development and HS2 works at Drayton Lane Crossing with Sutton Road. Too much development occurring in the local area with insufficient infrastructure provision. Scale of development of an inappropriate size for existing settlement. Object to loss of green belt.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.
LP2040 26	Lee Butler	1.17	Yes	Yes	No	Yes	No	Document contradicts itself in several places on the one hand preserve the land and heritage and on the other knock everything down and build elderly care and residential apartments. Obesity is addressed but no plans for GP's, leisure centres/gyms. Lichfield is dying it is becoming the Florida of the Midlands. We need to keep the young here. Can't get a GP appointment for weeks, have to travel out of the city to go to the cinema or use leisure facilities that are not crammed. All Lichfield offers me is care homes when I get old.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period.
LP2040 27	Julie Moore	14.24	No	No	No	Yes	Unanswered	Lichfield Council have not worked with the local community or Council's to select SHA2. Hundreds of objections raised in 2019/20 have been ignored. Does not comply with the NPPF in terms of protecting Green Belt land. Evidence such as traffic assessments at Mile Oak are not complete. Council has not considered all reasonable alternatives to SHA2. impact upon infrastructure including Tamworth and Ventura Park. Where are families meant to send their children to high school. Development would affect the biodiversity, climate chance and possibly lead to flooding in Fazeley. Remove SHA2 from the Local Plan 2040.	No changes required.	Local Plan 2040 has been subject to three previous rounds of public consultation prior to the regulation 19 consultation. All consultations have been conducted in accordance with the Council's adopted Statement of Community Involvement. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. Transport evidence is in the process of being completed ahead of submission following delays caused by the Coronavirus pandemic.



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LP2040 28	Peter Thompson	Whole document	No	No	No	Yes	No	District Council has not worked with local councils and the local community on selecting SHA2. Council have ignored hundreds of objections raised by local residents in 2019/20. Plan does not set out the exceptional circumstances required to justify the removal of land from the Green Belt. Some evidence is incomplete including traffic assessments. Sutton Road is already very congested at peak times. Development will mean more people using the local shops where parking is already a major issue. Results of the Green belt Review have not been interpreted correctly and the site should not be released from the Green Belt. Council has not consulted properly with the local community or considered the impact on the local community or Tamworth residents. brownfield sites and sites not in the Green belt should be chosen before SHA2. Not consistent with the NPPF section 2, section 5, section 8, section 13, section 14, section 15. SHA2 should be removed from the Local Plan 2040.	No changes required.	Local Plan 2040 has been subject to three previous rounds of public consultation prior to the regulation 19 consultation. All consultations have been conducted in accordance with the Council's adopted Statement of Community Involvement. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. Transport evidence is being undertaken having been postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.
LP2040 29	Roger Taylor	Whole document	No	No	No	Yes	No	Do not consider that a full assessment and consultation has taken place. Proposed allocation of 800 houses is far too many on boarder with Tamworth borough council and have an impact upon the infrastructure of Tamworth rather than Lichfield.  Remove SHA2 allocation - 800 houses is too many	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered.
LP2040 30	Paul Cornhill	Whole document	N/A	N/A	N/A	Yes	No	Object to development on the green belt at Fazeley. Concerns regarding level of growth and additional 800 homes would cause increased number of cars in the local area with minimal public transport infrastructure. This would add to the existing traffic difficulties on the roads which converge on the Mile Oak Traffic Lights where current traffic congestion impacts access onto and off of the A5 and along the A453 between Mile Oak and Bassett's Pole which will be made worse by HS2. This increase would also see an increase in vehicular accidents Development would also create localised increased levels of NOx and SOx pollution. This is now even more important in light of the UN report on Climate Change. . Do not consider that level of infrastructure required to make development, schools, doctors, water/sewerage etc. have been taken into consideration. The additional sewerage and waste water would be directed to Tamworth and put extra load on their water treatment facilities with existing waste water systems. This could result in additional strain on drainage and sewerage removal infrastructure. Consider that this allocation is a poor choice is compounded by the fact that this potential development is aimed at Green Belt land when there are plenty of brown field sites available and there is no justifiable reason for using Green Belt in this circumstance. Brownfield development should be the preferred options for the delivery of housing in the plan period.  Remove SHA2 allocation	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period.. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered.
LP2040 31	Inland Waterways - Philip Sharpe	Whole document	Yes	Yes	No	Yes	Yes	The principal policy supporting delivery of the Lichfield Canal is now Strategic Policy 8 so the Policies Map Key should be corrected to also reference SP8. (Note: This would change if it is agreed that the Lichfield Canal policy be separate from SP8). The largest scale map is Inset 1 Lichfield where the 'dashed line' is generally correct, but the section through the Deans lade and St John's SDA sites is displaced to the south and should be shown closer to Falkland Road and the new Bypass (Road line safeguarding). Figure 1: Lichfield District (page 19) and Figure 2: District Environment (page 25) share a common base map showing "Canals", but the middle section of the line of the Lichfield Canal is completely misplaced south and southwest of the City. For example, it should run immediately south of the boundary between the grey built-up area and the white SDA sites. Although these figures are diagrammatic, such inaccuracy conflicts with the level of precision of the other canals and features on the map. The proper route is as clearly shown on the key Policies Map which should be used to correct both these figures. (Note that IWA pointed out this error in our comments on the Preferred Options Plan and it is disappointing that it has not yet been corrected). Map 1: District Key Diagram (page 35) likewise shows the "Route for a restored Lichfield Canal" incorrectly, with the route so far displaced from reality that it is shown passing south of the Cricket Lane employment allocation and going to Whittington. Again, whilst recognising the diagrammatic nature of this map, it should not however be totally misleading. The Key Diagram should be corrected along with Figures 1 and 2 to be consistent with the main Policies Map. Figure 2: District Environment (page 25) includes "Safeguarded land" in the key and on the map in 3 places. However, there is no Safeguarded land in this Publication Plan. This appears to be a relic of the Areas of Development Restraint proposed at the Preferred Options Stage at Fossey Lane, Burntwood, and Mile Oak. IWA objected to the Fossey Lane designation which would have conflicted with the restoration of the Lichfield Canal and we are pleased that this has been dropped. The Figure 2 key and map should be corrected to remove all reference to Safeguarded Land. Canal Network - text should at 2.28 should be changed to: "The canal network throughout Lichfield District is extensive, passing through Armitage, Handsacre, Alrewas, Fradley, Whittington, Hopwas and Fazeley, and provides opportunities for recreation and tourism. The canal network incorporates both designated and non-designated heritage assets. A longstanding project to reopen the Lichfield Canal between Huddlesford, Lichfield and Brownhills is being undertaken by the Lichfield & Hatherton Canals Restoration Trust."	Propose modification to key od policy maps to correctly reference Strategic Policy 8 in relation to canal. Propose modification to Figure 2 to remove 'safeguarded land' from map key.	Propose modification to key in relation to correct referencing of Strategic Policy 8 in relation to canal. Figure 1 and 2 within plan are diagrammatic and considered appropriate for purpose at scale/size provided. Detail mapping is provided within separate policies maps. Propose modification to remove 'safeguarded land' from key of Figure 2.
LP2040 32	Bob Summerfield	SHA1	n/a	n/a	No	Yes	No	Overall supportive but would want the inclusion of site within SHA1 allocation. Land that borders existing approved development for 750 dwellings, adjacent to SHA1 allocation should be included within the SHA1 allocation within the 2040 Plan.	No changes required.	Comment noted. Not considered necessary to amend the boundary of the allocation.
LP2040 33	Luke Walker LHCRT	Whole document	Yes	Yes	No	Yes	No	Generally supportive of the overall plan, subject to the proposed amended changes, in alignment with changes put forward by IWA in rep LP2040 31. We are concerned about the inconsistencies in the presentation of the protected route for the canal throughout the maps within the overall document. The sections of the protected route for the canal where the dotted line on the Policies Map does not adequately identify the area of land required.	No changes required.	Figure 1 and 2 within plan are diagrammatic and considered appropriate for purpose at scale/size provided. Detail mapping is provided within separate policies maps
LP2040 34	Martyn Aidney	SHA2	n/a	n/a	n/a	n/a	n/a	Opposes development In Mile Oak for 800 homes. Roads are already very busy and congested during peak hours, the slip road from the A5 would be a serious hazard with the extra 1600+ cars on the road. The schools are at maximum capacity. The area is Green Belt when policy promised to prioritise brownfield development. Services such as doctors and dentists are already difficult to obtain appointments. Potential impact on local drainage with 800 homes feeding into the system.  The provision of 800 homes to an area of 2000 with destroy the character of the neighbourhood. LDC building on the border of Tamworth and expecting Tamworth to pick up the issues raised. LDC need to consider that new residents will consider Tamworth as their local town and the extra strain will be incumbent on Tamworth.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered.

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LP2040 35	Charlotte Draper	SHA2	No	No	No	N/A	No	Objects to the allocation of 800 houses - loss of green belt and increase in traffic will create an excessively urban environment. It will ruin the area and impact Tamworth's infrastructure.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period.. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered.
LP2040 36	Clive Thompson	B.13	No	No	No	Yes	No	No consultation with Tamworth Borough Council. Resident of Bonehill with 30+ years experience in highway traffic management. Significant traffic issues effect the Mile Oak cross roads. Junction capacity is already exceeded at peak times. Pedestrian facilities such as dropped kerbs, tactile paving and pedestrian phase urgently required. Right turn facilities need to be provided. Cycle facilities should be provided at the junction in accordance with LDC/SCC policy. investigation of vehicle approach speeds should be considered. Bus service provision is inadequate.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period.. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered.
LP2040 37	Jackie Gould	SHA2	No	No	No	Yes	No	Object to the allocation of 800 homes in Mile Oak. The Council have not worked with Tamworth Borough Council, Fazeley Town Council or the local community in engaging in the proposed allocation and previous objections. The Plan does not comply with the NPPF with regards to Protecting Green Belt Land. Key evidence is outstanding such as traffic assessments at Mile Oak are missing and the results of the 2019 Green Belt Review have not been interpreted correctly. Brownfield development and sites should be used instead. The proposed allocation is too big when compared to the size to the existing settlement.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period.. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered.
LP2040 38	Naomi Light	Whole document	No	No	No	Yes	Yes	In order to proactively meet development need and facilitate accurate quanta of growth, cross boundary considerations must be rigorously considered and appropriately distributed, as identified by paragraph 24 of the NPPF. When considering duty to cooperate, an area of key focus for Lichfield is the Greater Birmingham and Black Country housing market area (GBBCHMA) identifies that there is a need for around 11,500 homes per annum throughout the HMA, equating to 231,000 homes over a 20-year period based on current figures, however when factoring population growth and economic uplift, this may increase to as much as 310,000 over the period to 2036. The Lichfield Local Plan identifies that the Council only seek to accommodate 2,665 of unmet need (Strategic Policy 1) which equates to a limited 6.6% of the 40,325 figure. A simple rudimentary even distribution of the unmet need would still require Lichfield to accommodate 9% of the figure, even prior to factoring in deliverability factors and constraints. We also note that this is an existing unmet need and does not consider the potential additional need arising from uplifted figure of 310,000 over the period to 2036. Also of concern is the fact that the Preferred Options draft of the Lichfield Local Plan sought to accommodate 4,500 dwellings of unmet need (Strategic Policy OSS2), so rather than proactively seeking to accommodate much needed development, the current iteration of the Lichfield Local Plan is actively seeking to reduce the role it plays in meeting wider need. To reduce the need without updating the accompanying evidence base, or without apparent justification is both contrary to national policy, un-evidenced, and risks undermining deliverability throughout the entire HMA. Consider that the plan process needs to revisit and increase the apportionment of unmet need from the GBBCHMA accommodated within the Plan, particularly noting the significant areas available within Lichfield which are free of statutory restrictions on development such as Dunstall Farm.	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Contribution was decreased following the publication of the latest GBBCHMA position statement (published 2020) which indicated that BC shortfall emerges from 2027/28 and consideration of the housing trajectory in relation to historic growth levels of the District.
LP2040 39	Jessica Graham (Savills) for the Crown Estate	Strategic Policy 11	N/A	N/A	No	Yes	Yes	<p>The Crown Estate is promoting land to the west of Lichfield City (SHLAA sites 12, 16, 17, 339 and 340). SHLAA sites 16, 17, 339 and 340 have been assessed in the 2021 Green Belt Review as 'important'. These sites have therefore not been assessed within stage 3 of the Review. SHLAA site 12 has been assessed as 'moderately performing' in stage 3 of the Review, it is recommended that the site should be taken forward for further consideration an is not likely to harm the Green Belt.</p> <p>Alterations to the Green Belt require exceptional circumstances in line with Paragraph 140 of the NPPF, therefore the Green Belt Review recommendations are not justification in themselves that there are exceptional circumstances to release Green Belt sites. This is a matter that LDC needs to consider in the context of the wider plan constraints and development needs. LDC have proposed to release two parcels of land from the Green Belt at Whittington and Mile Oak and therefore LDC considers that there are exceptional circumstances to release sites from the Green Belt to meet their development needs (para 7.32 of the Submission plan).</p> <p>The NPPF makes it clear that small and medium sites make an important contribution to meeting the housing requirement of an area and that at least 10% of a plans housing requirement should be made on sites no larger than 1 hectare (para 69). SHLAA site 12 is circa 0.75ha, partially developed, located adjacent to Lichfield City, the most sustainable settlement, and is bound by the A51 to the west which would form a new defensible Green Belt boundary. Considers that the site should be released from the Green Belt and allocated within the plan for residential development.</p> <p>Paragraph 143 of the NPPF states that plans should identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer term development needs stretching well beyond the plan period and be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period. The Submission plan does not currently propose to safeguard any future land for development. The HMA Position Statement (2020) and Draft Black Country Plan confirm that there is expected to be significant shortfall beyond 2031 which we expect the HMA to accommodate. Therefore considers that the level of housing proposed to meet the District or HMAs housing need is not sound and therefore additional housing is required in order to meet housing needs.</p> <p>The Crown Estates sites to the west of Lichfield City should be considered for safeguarding to meet future needs.</p>	No changes required.	Comments noted - the plan 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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LP2040 40	Jessica Graham (Savills) for The Crown Estate	Strategic Policy 12	N/A	N/A	No	Yes	Yes	<p>It is not considered that the plan is currently positively prepared because LDC has based its GBBC HMA contribution on a Position Statement (2020, PS3) which has neither assessed the current housing position based on the standard method needs, nor assessed the housing shortfall beyond 2031, nor been independently examined. Considers there is significantly more than a 2,597 dwelling shortfall remaining up to 2031 which should be confirmed and accommodated within the HMA local plan reviews. Considers LDCs approach to meeting its own need is not sound. LDC has stated that based on the standard method its housing need is 321 dwellings per annum over the plan period. PPG is clear that the standard method sets the minimum housing need and does not produce a housing requirement figure and there may be circumstances where a higher requirement figure is appropriate, for example meeting unmet HMA needs. There is also a presumption in the NPPF (para 60) that plans should 'support the governments objective of significantly boosting the supply of homes'. LDC has not proposed to increase its housing need as its HEDNA (Sept 2019 and Nov 2020) concluded that no uplift beyond the standard method is needed from an economic perspective.</p> <p>LDCs adopted Core Strategy evidence base demonstrated that the Districts housing needs were between 410-450 dwellings per annum. LDC has not provided any evidence which justifies why there is a reduction of between 22-29% from its adopted housing need evidence. Considers the HEDNA also failed to consider previous assessments of housing need which clearly demonstrate that the there has been a recent history of delivering significantly more dwellings than the standard method (by 94% averaged over the last 3 years). Does not support the HEDNAs conclusion that 'there is no justification to increase housing need above the standard method in response to economic growth potential'. The HEDNA relies on the employment forecasts from Oxford Economics which has taken a view to economic growth that is contrary to economic ambitions set out in the regional, sub-regional and local growth strategies such as LDCs Economic Development Strategy 2016-2020 or the WMCA's 'Recharge the Midlands' 2020.</p> <p>LDCs approach to limiting the housing need to 321 dwellings per annum is not supported or considered sound. There is no evidence as to why LDC should be planning for growth of less than 410-450 dwellings per annum as adopted and as demonstrated by recent delivery rates. Once the HMA Position Statement has been updated to reflect the revisions made by the standard method, we consider that LDC will be required to accommodate additional dwellings to meet the HMA need and which should be in addition to the 410+ dwellings being planned for to meet the Districts own needs. The NPPF states that in order for a plan to be effective it should deal with cross-boundary strategic matters rather than deferring them to the next plan period (para 35). The proposed contribution to the HMA shortfall does not propose to tackle the housing shortfall post 2031, thereby deferring it to the next plan period. <del>Strategic Policy 1 states it will support communities in allocating sites within their Neighbourhood Plans to include site</del></p>	No changes required.	Comments noted. Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence.
LP2040 41	Roger Hockney, Lichfield Civic Society	Strategic Policy 17	Yes	Yes	No	Yes	Yes	<p>The civic society consider that policy SP17 is not sound and fails to contribute positively to the protection and enhancement of the conservation area covering the city centre of Lichfield and special unique heritage assets. This has been evidenced in recent developments in the city. Heritage assets should be referred to specifically in justification of a strengthened policy. it seems that Lichfield city centre is given no emphasis or priority and seemingly affords it no greater protection than many more localised elements, such as small village conservation areas, with very limited number of listed buildings or other heritage assets. The failure to include 'strategic policy' referring specifically to the special heritage character of the city centre and its protection and enhancement allied to the 'growth' agenda being promoted elsewhere in the local plan is a fundamental short coming. The 2008 Lichfield City Conservation Area Appraisal should be adhered to and incorporated in principle within the policy. This would mean that it would become more relevant and effective. The Local Plan is not consistent with the NPPF section 16, conserving and enhancing the historic environment. Para 189 states that 'heritage assets should be conserved in a manner appropriate to their significance' this is not achieved in the LP. the current LP makes little reference to the significance and importance of heritage and historic environment of Lichfield City Centre. The assets of the city centre need to be referenced to in the LP e.g. cathedral close, cathedral, medieval planned street pattern, beacon park etc. The Civic Society consider an additional paragraph should be added to discuss the importance of Lichfield City Centre Conservation Area and the need to conserve the area for the future of the city. This would address the concerns of the civic society regarding weakness of the policy and ensure appropriate priority and emphasis to be given to SP17 to the heritage asset of Lichfield. The councils existing policies have had little influence on the protection of the character of the city centre.</p>	No changes required.	
LP2040 42	Jeff Hateley	SHA2	No	No	No	Yes	No	<p>Lichfield Council have failed to engage with Tamworth Borough Council and Fazeley Town Council. Have failed to act on objections received from the local community in 2019/20. SHA2 is 7 miles away from the centre of Lichfield but only 2 miles from the edge of Tamworth so people will look to services in Tamworth adding pressure to the Borough Council and worsening access to services for existing residents. Plan has failed to understand what is needed in this part of the District. Plan is inconsistent with NPPF section 13 Protecting Green Belt Land as it proposed large scale removal of green belt to allow SHA2. Exceptional circumstances have not been demonstrated. Council have failed to interpret the Green Belt Review evidence and the allocation is therefore unsound. Allocation of SHA2 so contradictory to strategic objectives 1, 2, 3, 4, 12, 13 within the plan. Method and timing of the consultation has been poor and not adhered to the Statement of Community Involvement. Evidence is becoming out of date. Local Plan 2040 is not positively prepared as it is a flawed strategy which has not adequately considered brownfield and none green belt sites. Comments made during the Preferred Options consultation has been ignored as was a petition against the development in September 2020. SHA2 is disproportionate to the size of the existing community - would represent an increase of approx. 40%. infrastructure requirements have not been fully considered.</p>	No changes required.	Local Plan 2040 has been subject to three previous rounds of public consultation prior to the regulation 19 consultation. All consultations have been conducted in accordance with the Council's adopted Statement of Community Involvement. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.
LP2040 43	Jeff Hateley	SP1	No	No	No	Yes	No	<p>Not consistent with Section 13 of the NPPF Protecting Green belt Land. Exceptional circumstances needed to justify Green Belt release have not been demonstrated. Remove SHA2 from the Local Plan 2040.</p>	No changes required.	Comments noted - the plan 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 plan 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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LP2040 44	Lorraine Thompson	Whole document	No	No	No	Yes	No	Lichfield District Council have not worked with local councils or local communities to select SHA2. Council has ignored hundreds of objections to SHA2 in 2019/20. Plan does not comply with the NPPF on protecting green belt land as SHA2 is within the green belt and exceptional circumstances have not been provided. Transport evidence is not complete. Results of the Green Belt evidence has not been interpreted correctly. Council has not properly consulted with the local community. Brownfield sites should be chosen before Green belt sites. Infrastructure requirements and implication so SHA2 have not been fully considered. Not consistent with Section 2, 5, 8, 13, 14, 15 of the NPPF. SHA2 should be removed from the Local Plan 2040 and another site allocated closer to a train station.	No changes required.	Local Plan 2040 has been subject to three previous rounds of public consultation prior to the regulation 19 consultation. All consultations have been conducted in accordance with the Council's adopted Statement of Community Involvement. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.
LP2040 45	Anthony Foster	Whole document	No	No	No	Yes	No	Strongly object to SHA2 allocation for 800 homes. Loss of greenbelt, lack of infrastructure and will cause further strain on existing infrastructure.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. The plan 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.
LP2040 46	Susan Morgan	SHA2	No	No	No	Yes	No	The plan does not comply with national planning policy on protecting green belt. Exceptional reasons to justify 800 homes in green belt are not set out in the local plan, traffic results are missing and results of 2019 Green Belt review have not been interpreted correctly, allocation of SHA2 does not meet several strategic objectives and priorities set out in sustainability appraisal such as sustainable communities, rural communities, climate change, countryside character and natural resources, LDC has not consulted properly with local community or considered impact of development on Tamworth residents, consulting in a pandemic feels disingenuous. Brownfield sites should be chosen before green belt, objections in preferred options consultations have been ignored. reasonable alternative sites not considered. More information on traffic assessment at mile oak junction, impact on local infrastructure including Tamworth, school places need to be considered first. SHA2 is too big when compared to the existing size of Fazeley ward. The development will result in there being no accessible green spaces in Mile Oak area. The allocation of SHA2 is not consistent with the following NPPF policies - (2) achieving sustainable development , (5) delivering a sufficient supply of homes - SHA2 out of proportion (8) Promoting healthy and safe communities - removal of valuable countryside and accessible green space (13) protecting green belt - the exceptional circumstances for SHA2 are not set out (14) meeting challenge of climate change, flooding and coastal change - SHA2 would increase further flooding (15) Conserving and enhancing the natural environment - SHA2 will destroy the natural environment and damage the character and beauty of the countryside. Remove SHA2 from local plan 2040, allocate another site that is not in the green belt and closer to the train station.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. The plan 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.
LP2040 47	Charles Sanders	SHA2	No	No	No	No	No	The plan does not comply with national planning policy on protecting green belt. Exceptional reasons to justify 800 homes in green belt are not set out in the local plan, traffic results are missing and results of 2019 Green Belt review have not been interpreted correctly, allocation of SHA2 does not meet several strategic objectives and priorities set out in sustainability appraisal such as sustainable communities, rural communities, climate change, countryside character and natural resources, LDC has not consulted properly with local community or considered impact of development on Tamworth residents, consulting in a pandemic feels disingenuous. Brownfield sites should be chosen before green belt, objections in preferred options consultations have been ignored. reasonable alternative sites not considered. More information on traffic assessment at mile oak junction, impact on local infrastructure including Tamworth, school places need to be considered first. SHA2 is too big when compared to the existing size of Fazeley ward. The development will result in there being no accessible green spaces in Mile Oak area. The proposed area is subject to flooding, building here subjects the residents of mile oak to risk, LDC should be liable. The allocation of SHA2 is not consistent with the following NPPF policies - (2) achieving sustainable development , (5) delivering a sufficient supply of homes - SHA2 out of proportion (8) Promoting healthy and safe communities - removal of valuable countryside and accessible green space (13) protecting green belt - the exceptional circumstances for SHA2 are not set out (14) meeting challenge of climate change, flooding and coastal change - SHA2 would increase further flooding (15) Conserving and enhancing the natural environment - SHA2 will destroy the natural environment and damage the character and beauty of the countryside. Remove SHA2 from local plan 2040, allocate another site that is not in the green belt and closer to the train station.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. The plan 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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LP2040 48	Sue Walton	SHA2	No	No	No	No	No	LDC has not worked with the local councils or local community to select SHA2 at Mile Oak. The council have ignored hundreds of objections raised in the preferred option consultation. The plan doesn't comply with the NPPF on protecting green belt land. there is no justification for 800 homes. brownfield sites should be selected before Green Belt is considered. The council has failed to demonstrate reasonable alternatives. SHA2 should not be selected before gathering all evidence such as traffic assessments of Mile Oak junction, assessment on impact on local infrastructure, road infrastructure, schools, shops, medical facilities and nearby locations of Ventura Retail Park and Drayton Manor. Infrastructure not in place in Mile Oak with one small convenience store, fish and chip shop. Robert Peel hospital which is under resourced and under used. Fazeley is very busy with limited amenities and local schools only cater for infants/juniors and already running at full capacity. Secondary schools in Tamworth will be insufficient with further development in Tamworth. The road infrastructure such as M42 and A38 and connections to Sutton Coldfield already cause issues in Tamworth and with HS2 things will worsen. The Council has not demonstrated to local council and communities that it has considered other available sites. Local plan 2040 is no consistent with Section 2 = it will not protect/enhance the natural environment. it may worsen biodiversity and lead to flooding in Fazeley. The site will be located across a busy main road with existing houses. Also S5 not proportionate, S8, S13, S14, S15 are all not met. SHA2 should be removed from Local Plan along with any plans which include Bonehill and Fazeley and give serious and proper consideration to other and non greenbelt sites.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. The plan 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.
LP2040 49	Cllr Steven Norman	13.4	Yes	Yes	Yes	No	No	Considers that the Local Plan 2040 is consistent with the NPPF and therefore the Secretary of State or Planning Inspectors should not support planning applications that do not comply with the agreed Local Plan.	No changes required.	Support for the Local Plan 2040 is noted.
LP2040 50	Cllr Steven Norman	Local Policy B2: Burntwood Services and Facilities	Yes	Yes	Yes	No	No	Considers the Local Plan 2040 to be justified as the agreed Neighbourhood Plan (Burntwood) reflects this. Considers the Local Plan 2040 to be effective providing the Secretary of State does not override the agreed Local Plan when considering future major applications.	No changes required.	Support for the Local Plan 2040 is noted.
LP2040 51	Cllr Steven Norman	13.7	Yes	Yes	Yes	No	No	Considers the Local Plan 2040 complies with the Duty to Co-operate although it is a shame that neighbouring authorities have not proven willing to cooperate with Lichfield District when it comes to retail development.  The need to reduce travel whether to shops or businesses for leisure or employment purposes is essential for Burntwood residents. The need and desire for shops and leisure facilities in the "town centre" site - along with some housing is supported by residents as evidenced by the agreed Neighbourhood Plan referendum. Therefore this particular issue is entirely justified and realistic.	No changes required.	Support for the Local Plan 2040 is noted.
LP2040 52	Cllr Steven Norman	13.9	Yes	Yes	Yes	No	No	It should be noted that these are very small "Neighbourhood centres" providing small retail units or services but no leisure facilities. In the case of Sankey's Corner it has had a large unit empty for over 25 years and is in need of - at least - a major overhaul.	No changes required.	Comments noted. An AAP is to be prepared for Burntwood.
LP2040 53	Jeff Hateley	Table 4	No	No	No	Yes	No	See my detailed comments submitted to Strategic Policy SHA2. Remove policy SHA2 from the Local Plan 2040.	No changes required.	Local Plan 2040 includes proposed allocations considered to be appropriate to delivery the strategy of the local plan.
LP2040 54	Joy Shepherd	3.20	No	No	No	Yes	No	LDC have not worked or consulted the local community or neighbouring councils in relation to the proposed 800 houses to be built in Mile Oak. Objections from hundreds of residents raised during the preferred options consultation exercise in 2019/20. Exercise was poorly advertised and many local residents were not aware of the plans and feels that this was merely a paper exercise on behalf of LDC.  Considers the plan does not meet the legal and procedural requirements due to incomplete evidence due to Covid-19 particularly the traffic assessment.  The Green Belt Review (2019) has not been interpreted correctly. Brownfield sites should have been chosen for development before the use of existing Green Belt.  The plan is not effective or deliverable as infrastructure will not support it. Traffic on the A453 is horrendous and adding 800 houses will make it worse and decrease the air quality.  Remove the SHA2 allocation, it is disproportionate, Mile Oak is a small settlement with limited services. There are no cycle pathways in the area and limited footpaths.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. The plan 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.
LP2040 55	Neil Holly	Policy SHA1	Yes	Yes	No	Yes	No	Policy SHA1 is contrary to paragraph 73 of the NPPF. It proposed a significant extension to an existing town, but does not set clear expectations for the quality of places to be created and how this can be maintained nor does it ensure appropriate tools (masterplans/design guides or codes) or used. Shape of the allocation appears to be dictated by landownership. A 'concept statement' is appended to the plan but is not referred to in the policy. It is stated in the policy that there will be an overarching masterplan for whole area - it does not identify who will prepare this or how community engagement will be achieved.  Contrary to paras 104, 105 and 106 the policy does not identify and pursue opportunities to promote walking, cycling and public transport. The location of the site is beyond the town's ring road and railway line means there are significant issues of disconnect. Without clear requirements for creating a direct intuitive well designed pedestrian and cycle network the site will have poor design, disconnect and car dependence.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. Local Plan 2040 includes policies relating to design and the requirements to ensure homes are suitable across lifetimes.
LP2040 56	Neil Holly	Policy SP1	Yes	Yes	No	Yes	No	Why was a rail (rather than A38) based spatial strategy not considered which would imply strategic development at Shenstone rather than Fradley. Through the north of Lichfield and Fradley developments this plan is effectively A38 settlement - a linear urban sprawl from Lichfield to Alrewas along the A38. The risk of this is car-dependency and promoting junction-hopping short trips along roads intended for strategic use. The plan makes no effort to mitigate its inevitable consequences. The plan does not set out any kind of mission for zero carbon or sustainable planning. There is no transport strategy and the plan is limited on sustainable transport, the opportunity to extend the cross city line is not mentioned. There is no provision for strategic bicycle routes to join up the Lichfield-Streethay-Fradley-Alrewas settlement. The absence of a strategy for linking spatial and strategic transport planning fails to accord with NPPF paragraphs 104-105 and 154 and is not sound.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period.
LP2040 57	Jayne Cornhill	Whole document	Unanswered	Unanswered	Unanswered	Unanswered	No	Removal of the site at Mile Oak from the local plan 2040, to be replaced by an alternative site that is not on green belt land and a site that has public transport links with Lichfield District Council.	No changes required.	The Local Plan 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.



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LP2040 58	Jayne Cornhill	Whole document	No	No	No	No	Unanswered	Do not feel Lichfield District Council have worked sufficiently well with other local councils - such as Tamworth Borough Council and Fazeley Town Council. There has been insufficient liaison with the local community.  The plan is inconsistent with the NPPF section 13 in relation to the protection of Green Belt land. The development of 800 houses will remove a large area of Green Belt and vastly increase the size of Mile Oak in a disproportionate level. There is insufficient infrastructure to support a new community of this size. The traffic in the area is often at a standstill. Local Plan has not taken into account suitable brownfield sites over building on Green Belt.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.
LP2040 59	Jayne Cornhill	Whole document	No	No	No	No	Unanswered	Do not feel Lichfield District Council have worked sufficiently well with other local councils - such as Tamworth Borough Council and Fazeley Town Council. There has been insufficient liaison with the local community.  The plan is inconsistent with the NPPF section 13 in relation to the protection of Green Belt land. The development of 800 houses will remove a large area of Green Belt and vastly increase the size of Mile Oak in a disproportionate level. There is insufficient infrastructure to support a new community of this size. The traffic in the area is often at a standstill. Local Plan has not taken into account suitable brownfield sites over building on Green Belt.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.
LP2040 60	Keith Dawson	Whole document	Unanswered	Unanswered	Unanswered	Unanswered	No	[LDC note] No comment made.	No changes required.	Not applicable.
LP2040 61	Keith Dawson	B.14	No	No	No	No	No	Provision to ensure that there are no negative impacts on the current air quality within that area. I fail to see how that can be achieved when 800 gas heated homes and 800-1600 largely internal combustion engine vehicles are placed in the area.	No changes required.	Local Plan 2040 includes policies relating to air quality and actions which will be required to mitigate impacts on air quality.
LP2040 62	Keith Dawson	2.3	Yes	No	No	No	No	Figures shown elsewhere show LDC growth is low compared with national average and thus does not bare out the argument that it is a much sought after location for commuters to the West Midlands conurbation. Believe that much of the development is distributed around the boarder with Tamworth, pushing the infrastructure requirements onto Tamworth whilst Lichfield receives the financial benefits.	No changes required.	Evidence supporting the Local Plan 2040 demonstrates that Lichfield District is within the GBHMA. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period.
LP2040 63	Keith Dawson	2.9	No	Unanswered	Unanswered	Unanswered	No	Where is the evidence for this statement of a need or desire for further development of housing in the 2-3 bedroom stock? Tamworth has a huge development just over the border from Fazeley and has a balance of all size and value of housing. Further developments are also being built throughout Tamworth providing this type of housing stock.	No changes required.	Evidence within the Housing and Economic Development Assessment provides assessment of housing needs for Lichfield District. This indicates high need for two and three bedroom homes. Developments within Tamworth Borough are a matter for the Tamworth Local Plan.
LP2040 64	Keith Dawson	2.19	No	Unanswered	Unanswered	Unanswered	No	There are no senior schools forming part of Lichfield District in the Fazeley area. The Tamworth senior schools are already at capacity and the principal school for this Area, (Rawlett) is already a large school of some 1400 students. The movement of students to this school from the proposed development would further increase the pressure on the local roads at peak times. The plan only provides for a small primary school.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Concept Statement for strategic housing allocations include infrastructure requirements.
LP2040 65	Keith Dawson	2.23	Unanswered	Unanswered	Unanswered	Unanswered	No	Drayton Manor Park causes major traffic delays at peak times due to the volume of traffic approaching it. Queues of one hour delay are not unusual at weekends and bank holidays around the Coleshill Road, Watling Street, Fazeley Road, Sutton Road and Bonehill Road. Lack of infrastructure improvements will result in further road traffic congestion.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period.
LP2040 66	Keith Dawson	3.9	Unanswered	Unanswered	Unanswered	Unanswered	No	By vastly increasing the population of specific areas such as Mile Oak the experience of a strong sense of local identity, of safety and of belonging will clearly be lost through dilution.	No changes required.	Local Plan 2040 includes policies to deliver healthy and safe communities.
LP2040 67	Keith Dawson	3.15	Unanswered	Unanswered	Unanswered	Unanswered	No	The Mile Oak development plan is in green belt.	No changes required.	Local Plan 2040 proposes to remove the site at Mile Oak from the Green Belt. 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.
LP2040 68	Keith Dawson	2.6	No	Yes	No	Unanswered	No	The rural nature of this part of Lichfield District has a static population of people who have lived all of their lives (or at least the major Part) and this is borne out by the figures quoted. This relatively quiet, rural environment is the main reason for people staying put. Changing the demographics will not improve anything for the existing population.	No changes required.	Local Plan 2040 is supported by extensive evidence base. This includes evidence relating to housing need based upon established demographics.
LP2040 69	Keith Dawson	2.15	Unanswered	Unanswered	Unanswered	Unanswered	No	Removal of open farmland and replacing with housing developments will further reduce the opportunity for people to take exercise. It is apparent that people prefer walking in local open, rural countryside than through busy, noisy housing developments.	No changes required.	Local Plan 2040 seeks to deliver sufficient homes to meet the District's established local housing need.
LP2040 70	Keith Dawson	2.16	No	Unanswered	Unanswered	Unanswered	No	With the development of 750 houses just over the border of the A5 and the plans to develop land for 800 houses at Mile Oak, I fail to see how the transport network will be improved. There appears to be no infrastructure improvements and little opportunity to do so. Traffic will be forced into already overburdened local roads as it migrates towards the major routes into Birmingham and elsewhere. The A453 and the A5 serve as corridors to the M6, M6 toll and M42. These roads are already at capacity with long delays at peak travel time.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period.
LP2040 71	Keith Dawson	2.21	Unanswered	Unanswered	Unanswered	Unanswered	No	I expect that there will be a significant increase in home working as the future unfolds. Thus it would seem that there will be less demand for significant industrial/commercial premises in the future.	No changes required.	Local Plan 2040 includes policies to deliver employment land to meet requirements established through evidence.
LP2040 72	Keith Dawson	3.7	Unanswered	Unanswered	Unanswered	Unanswered	No	Protection of the character of the city from large scale development pressures. This seems to suggest that in order to protect the city, development will take place on peripheral, green belt land.	No changes required.	Local Plan 2040 seeks to deliver sufficient homes to meet the District's established local housing need.

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LP2040 73	Keith Dawson	3.14	Unanswered	Unanswered	Unanswered	Unanswered	No	The Mile Oak plan has inadequate infrastructure and has a ridiculously high number of dwellings proposed compared to the size of the existing housing numbers.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 seeks to deliver sufficient homes to meet the District's established local housing need.
LP2040 74	Keith Dawson	3.16	Unanswered	Unanswered	Unanswered	Unanswered	No	There is nothing small scale about the Mile Oak plan especially when the development at Dunstall Lane is taken into account.	No changes required.	Local Plan 2040 seeks to deliver sufficient homes to meet the District's established local housing need. Developments within Tamworth Borough are a matter for the Tamworth Local Plan.
LP2040 75	Keith Dawson	14.33	Unanswered	Unanswered	Unanswered	Unanswered	No	There are no senior schools. The nearest is Rawlett which is at capacity currently. Transport taking pupils to this school will further increase congestion on the local roads through Hopwas and Tamworth.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Concept Statement for strategic housing allocations include infrastructure requirements.
LP2040 76	Keith Dawson	B.13	Unanswered	Unanswered	Unanswered	Unanswered	No	The plan to develop this site for 800 dwellings is wholly disproportionate to the size of the local community (Mile Oak). The road infrastructure is inadequate for the increased traffic. Mile Oak junction is already a black spot at peak times, resulting in long tail backs on the Watling St, Sutton Road and Bonehill Roads. Drayton Manor Park further adds to the congestion at specific times. Further housing developments both at Dunstall Lane and Mile Oak will further increase congestion and pollution both from noise and fumes. A significant loss of natural trails and walks due to the development will further reduce the ability for local residents to take healthy exercise.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Concept Statement for strategic housing allocations include infrastructure requirements.
LP2040 77	Jayne Cornhill	Chapter 1	Unanswered	Unanswered	No	Unanswered	Unanswered	Plan is not consistent with NPPF. It proposes to build a large development on the edge of the existing trunk road (A453). This does not create a healthy community and would divide a community in half. Development will not enhance or protect the natural environment and worsen biodiversity. Lack of public transport and all residents will be reliant on cars resulting in poorer air quality within the area. Lichfield does not have any direct transport links with this area.	No changes required.	Local Plan 2040 includes policies relating to air quality and actions which will be required to mitigate impacts on air quality. Local Plan 2040 includes policies which require improvement to biodiversity through development.
LP2040 78	Norman Paske	1.2	Yes	Yes	No	Unanswered	No	We welcome the adoption of the Lichfield SPV setting out your BNG policy of 20% . We note and highlight however that the allocated sites only need to provide 10% BNG and would respectfully suggest that to be consistent 20% should be adopted per the SPV.	No changes required.	Comments noted. Local Plan 2040 includes policies which require improvement to biodiversity through development.
LP2040 79	M Tamplin	1.8	Whole document	Unanswered	Unanswered	Unanswered	Unanswered	[LDC note] No comment made.	No changes required.	Not applicable.
LP2040 80	Julia Spencer	Paragraph 14.81	Yes	No	No	No	No	There is no scope for commenting on site allocations. There has been a lack of transparency on the reasons behind the choices of site allocations. The statement concerning the viability of Whittington as a sustainable settlement is not justified. Whittington is a so-called village, evidenced by the buoyant housing market, the high school numbers and the growing population, shown in the census data.  The Green Belt policy within the NPPF of not allowing development on Green Belt land, unless there are exceptional circumstances has not been evidenced with regard to the site allocation within Whittington.	No changes required.	Comments noted, assessment has been conducted against all proposed allocation sites. Extensive work via the Green Belt Review has been conducted to provide the relevant evidence and justification for allocating this site.
LP2040 81	David Johnson	SHA2	No	No	No	Yes	N/A	The LP does not comply with the duty to cooperate as LDC has not worked with Tamworth Borough Council and Fazeley Town Council in the selection of the site and residents have been ignored from the previous consultation exercise. SHA2 does not have highways approval. the plan is inconsistent with the NPPF as it removes large areas of green belt and the exceptional circumstances are not demonstrated. the development would result in a significant extension in the open countryside with limited containment, the green belt boundary at the natural edge of A453 should be maintained in order to preserve open countryside, development will not assist in the regeneration of Fazeley and discourage the use of derelict and other urban land. the council have incorrectly interpreted the result of the 2019 Green Belt Review and has mistakenly concluded that parcel of land FZ1 is suitable for Green Belt release. The allocation of SHA2 is contradictory to several strategic objectives and priorities examined in the sustainability appraisal: 1. sustainable communities - allocate the majority of need in non greenbelt locations, ensuring new communities are well associated with existing settlements and services 2. Rural communities - rural communities will continue to grow through small scale incremental development 3. climate change = development should not impact on the environment and it should offer opportunity to mitigate and adapt to the effects of climate change 4. infrastructure - to meet the need for increased infrastructure necessary to support new and existing communities, assisting regeneration and infrastructure and service improvement, 12 - Countryside character - development must address rural development needs and contribute positively to local character and preserve the openness of the green belt. 13. all decisions should seek to protect, enhance natural resources 4. the consultation methods have been poor and not adhered to statement of community involvement which states a number of consultation techniques - comments by local residents have subsequently been ignored. Regulation 19 is unsound as it coincides with school summer holidays and should have been delayed until September to encourage more participants. the council has chosen to ignore previous objections to SHA2. The strategy is not sound and has not considered brownfield sites and sites not in greenbelt. not positively prepared as residents comments ignored. the local plan does not take into account reasonable alternatives to SHA2, evidence to justify SHA2 is not complete or is flawed. highways and SC have not commented on traffic. schools/health centres etc. can be extended, roads are already congested on a daily basis, disproportionate to existing community. 29% increase to Fazeley. not deliverable as infrastructure not considered. This area is used by local residents for exercise in the countryside and will be lost. SHA2 is not consistent with the NPPF sections 2, 5,8,13,14,15	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes policies relating to the protection and enhancement of the natural environment. Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence.
LP2040 82	Sarah Cunningham	SHA2	No	No	No	Yes	N/A	LDC have not worked with local councils or local communities to select objections to SHA2 raised in the preferred options consultation. The plans have been put on view in Burntwood but not on view near where the proposed site is happening, some residents aren't even aware of the proposals.  The Plan does not comply with national policy on Green Belt land. There will be at least 1600 extra cars in the area. Some evidence is not complete in relation to traffic assessment at Mile Oak. The traffic is already extremely busy and congested. The traffic is dangerous as it backs up onto the slip road coming off the A5 bypass. There is also congestion at Fazeley, which has 5 takeaways, 3 restaurants, 3 public houses, several hotels and a Tesco but only roadside parking. There is also a primary school on the same road and there would be an increased risk. It is a dangerous place to go at peak times of day, not to mention the traffic that builds up from Drayton Manor Park. The Park traffic blocks the traffic island, extra traffic will only add extra pressure to the already saturated network.  The results of the 2019 Green Belt Review have not been interpreted correctly and the site at Mile Oak should not be released from the Green Belt, this would be detrimental to the environment, wildlife and health and wellbeing of the local community. The impact on the environment would be huge so to say that LDC are going to 'minimise the impact' is a meaningless statement. The allocation of SHA2 west of Mile Oak does not meet several strategic objectives and priorities set out in the sustainability appraisal, particularly the sustainable communities, climate change, rural communities, countryside character and natural resources.  Consideration has not been given to the facilities needed to sustain the amount of people being added to the community. Schools and doctors are already saturated. The development will put pressure on Tamworth Council, not Lichfield as they will be reliant on using Tamworth's infrastructure and services. An alternative location should have been sourced from a brownfield site. There is no provision for extra high school. The amount of housing on this site is not proportionate when compared to the size of the existing Fazeley ward. Burntwood comprises of only 4% of homes, compared to 29% for smaller rural settlements (mainly in SHA2).  The Local Plan 2040 and allocation of SHA2 is not consistent with Section 2, Section 5, Section 8, Section 13, Section 14 and Section 15 of the NPPF.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. Transport evidence is being undertaken having been postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.

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LP2040 83	Wendy Chapman	SHA2	No	No	No	Yes	N/A	<p>LDC has not worked with local councils or the local community in the selection of SHA2, objections have been ignored from the community. The allocation does not have highways approval.</p> <p>The plan is not consistent with the NPPF section 13 'protecting green belt land' as it removes green belt, the exceptional circumstances are not demonstrated., several purposes of para 138 have been contravened, significant extension into the open countryside with very limited containment on the site boundaries and unrestricted urban sprawl. the green belt boundary, the green belt boundary on the A452 should be maintained in order to preserve open countryside, it will not assist in the regen of Fazeley and would discourage use of brownfield land. The council has incorrectly interpreted the results of the 2019 green belt review has included FZ1 mistakenly as suitable for green belt release. The allocation of SHA2 is contradictory to several objectives and priorities examined in the sustainability appraisal including: section 1, section 2, section 3, section 4 , section 12. section 13. section 4. The regulation 19 consultation is unsound as it coincides with school summer holidays and should have been delayed to encourage more participation. The council has chosen to ignore previous objections to SHA2 in the preferred options consultations.</p> <p>the plan is unsound and does not consider brownfield sites or non greenbelt sites, it is not positively prepared as comments have been ignored by local residents.</p> <p>the LP does not take into account reasonable alternatives to SHA2, the evidence base is nor proportionate and is incomplete or flawed: highways and SCC have not yet commented on traffic aspect, schools/health centres can be extended, roads are already congested and will not handle more traffic, incorrect interpretation of green belt review (2019) as SHA2 makes an important contribution to the green belt. It is disproportionate foot the ease of existing community. Disproportionate when Burntwood will take 4% of dwellings, compared to 29% for smaller settlements which is mainly in Fazeley.</p> <p>the plan is not effective or deliverable over the plan period as the infrastructure requirements and implications of SHA2 have not been fully considered such as the traffic on Sutton Road. SHA2 is in green belt contrary to national planning policy, other sites are available not on Tamworth's border that should be selected before green belt boundary changes are permitted at Mile Oak. this area is used by local residents for exercise in the countryside which will be lost if built on.</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.
LP2040 84	Josephine Ewart	SHA2	No	No	No	Yes	No	<p>LDC has not worked with local councils or the local community in the selection of SHA2, objections have been ignored from the community from the preferred options consultation.</p> <p>The plan does not comply with NPPF policy on green belt , it is unsound as there are no exceptional reasons to justify 800 homes in the greenbelt are not set out in the local plan. no traffic assessments have been included and the results of 2019 green belt review not interpreted correctly. the allocation of SHA2 does not meet several objectives set out in the sustainability appraisal. The council has nor consulted properly with the local community or considered the impact on Tamworth's residents. The regulation 19 consultation is unsound as residents are distracted with summer holidays and the Covid pandemic.</p> <p>Brownfield and sites not in greenbelt should be chosen before SHA2, objections to SHA2 made during preferred options have been ignored.</p> <p>the council have not properly considered reasonable alternatives to SHA2. SHA2 should not have been selected until all evidence is gathered - traffic assessments at mile oak junction, impact on local infrastructure including in Tamworth where houses are being built, primary and high school places. SHA2 is too big when compared to Fazeley. Burntwood has only 4% of dwellings. Tamworth is already struggling.</p> <p>Local Plan is not effective or deliverable over the plan period as the infrastructure requirements and implications of SHA2 not fully considered - traffic on the A353 between Sutton Coldfield and Tamworth, other infrastructure requirements.</p> <p>The Local Plan 2040 and allocation of SHA2 is not consistent with the following sections of the NPPF - Section 2, Section 5, Section 8, Section 13, Section 14, Section 15. SHA2 will destroy the natural environment and damage the character and beauty of the countryside, local wildlife has already suffered enough and with HS2 also, no where for wildlife to go.</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.
LP2040 85	Peter Sheriff	SHA2	No	No	No	Yes	No	<p>LDC has not worked with local councils or the local community in the selection of SHA2, objections have been ignored from the community from the preferred options consultation.</p> <p>The plan does not comply with NPPF policy on green belt , it is unsound as there are no exceptional reasons to justify 800 homes in the greenbelt are not set out in the local plan. no traffic assessments have been included and the results of 2019 green belt review not interpreted correctly. the allocation of SHA2 does not meet several objectives set out in the sustainability appraisal. The council has nor consulted properly with the local community or considered the impact on Tamworth's residents.</p> <p>Brownfield and sites not in greenbelt should be chosen before SHA2, objections to SHA2 made during preferred options have been ignored.</p> <p>the council have not properly considered reasonable alternatives to SHA2. SHA2 should not have been selected until all evidence is gathered - traffic assessments at mile oak junction, impact on local infrastructure including in Tamworth where houses are being built, primary and high school places. SHA2 is too big when compared to Fazeley. Burntwood has only 4% of dwellings, compared to 29% for smaller settlements this is not proportionate.</p> <p>Local Plan is not effective or deliverable over the plan period as the infrastructure requirements and implications of SHA2 not fully considered - traffic on the A353 between Sutton Coldfield and Tamworth, other infrastructure requirements.</p> <p>The Local Plan 2040 and allocation of SHA2 is not consistent with the following sections of the NPPF - Section 2, Section 5, Section 8, Section 13, Section 14, Section 15. SHA2 will destroy the natural environment and damage the character and beauty of the countryside.</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.

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LP2040 86	Jayne Ackers	SHA2	N/A	N/A	N/A	N/A	N/A	<p>The views of residents of 2020 was not used and residents are still being asked the same information in the form.</p> <p>In the 2040 LP it is proposed that there will be a new primary school in place, but there is no mention of a new high school. the Rawlett High School is already at full capacity. it is requested that the views put forward in January 2020 be carried forward to this review and confirmation is required for this. SHA2 will put extra strain upon Tamworth Borough Council with strain on amenities and resources. The proposed increase of homes is disproportionate with the current distribution of dwellings. These plans will destroy the natural growth in the area and reduce the value of homes in the area. Presumably the result of these plans will result in residents receiving a hefty reduction in Lichfield Council Tax due to devaluation in properties.</p> <p>The main Sutton Road has become increasingly busy and congested, there is a need for a central bollard island at the entrance of the road to avoid increasing number of serious accidents that have been occurring. Disruption will also come from the proposed HS2 development which will cause increased traffic congestion. This route suffers with traffic in both directions to Tamworth and Sutton Coldfield. Many HGV's use this route at all hours, delivering to Ventura Park. 800 extra homes will cause disruption and gridlock both ways. it can take 20 minutes to cross current traffic at busy times from Gainsborough Drive. In terms of schools there is a great pressure on local schools. Manor Primary School is already under pressure. standards will decrease, children will received poor education. With secondary schools and SEN services will be put under pressure.</p> <p>There are plenty of brownfield sites in the area without encroaching on protected green belt sites. Tamworth should be left alone as the area already suffers with congestion which impacts peoples safety and standards of living.</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.
LP2040 87	Andrew Tomms	Whole document, SHA4	Yes	Yes	Yes	No	N/A	<p>I am writing in support of the local plan. Especially in policy of keeping villages alive not being strangled by greenbelt. In particular Whittington village.</p>	No changes required.	Support noted for the Local Plan 2040.
LP2040 88	Denise Clarke	SHA2	No	No	No	Yes	No	<p>LDC have not worked with local councils or local communities to select objections to SHA2 raised in the preferred options consultation. LDC have been intent on pushing through a flawed plan on green belt at whatever cost, consultations have been poorly proposed and local consultations events organised in working hours, school holidays and poorly publicised and poorly attended, only one organised for Fazeley on a Tuesday afternoon.</p> <p>SHA2 is in greenbelt which the NPPF outlines to protect so LDC are not in compliance as 'exceptional reasons' have not been outlined. no evidence of any traffic survey within the plan, traffic congestion in the local area is bad on a daily basis, numerous RTC's occurring, large vehicles pass through this area also to industrial estates and Ventura park deliveries. The development would add 1000+ more vehicles to local roads. The impact on infrastructure has not been consulted upon with the Tamworth community.</p> <p>Objectively assessed development and infrastructure requirements have not been met. no consideration for extra senior school places, Rawlett High School is already over subscribed, the plan only considers primary school. Facts have been ignored such as 750 homes at Dunstall Park, HS2 will be proximate to the proposed housing and will increase flooding issues. the development will result in an increase of 40% to Fazeley. Although the area is within LDC the consequences affect the development in Tamworth's infrastructure. Brownfield sites should be considered before SHA2, what is to prevent urban sprawl beyond this development. the views of locals have been ignored by LDC. This land is well used for exercise by the community with limited other local options.</p> <p>LDC should have considered all reasonable alternatives first. essential evidence is missing from the plan, key traffic data collection is required as well as cross boundary impact assessments relating to consequences to infrastructure. no account of recent development. there is far too much development already on going in this area.</p> <p>The local plan is neither effective nor deliverable over the period of the plan due to the fact that the infrastructure requirements have not been fully considered.</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.
LP2040 89	Valerie Brocklebank	SHA4, whole document	No	No	N/A	N/A	N/A	<p>Concern is the building of 70 houses on land that is green belt farming land. how is the road going to be widened at Huddlesford with all the trees and hedges. The area has lots of wildlife and nesting birds and wildflowers which will be affected. There is a small surgery in the area, how can the area sustain the extra houses and the people who will need to use the surgery and school which are not big enough for the proposed housing as well. HS2 is another issues that the village is dealing with, the village roads already suffer with traffic. the roads do not allow for easy manoeuvring of the bus.</p> <p>The proposed site has a public right of way running through how will this be dealt with? there should be no more building so the village can stay as a village for our future generations</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. SHA4 was included within the Preferred Options document. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.



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LP2040 90	Angela Smedley	SP1	No	No	No	yes	Yes	<p>The proposed plan period is generally supported. The principle of LDC accommodating new homes to help unmet needs from GMMHMA is supported Mercer Farming ltd are concerned that the quantum of unmet need LDC is planning for is too low and not clearly justified. LDC will need to make a 4,500 dwelling contribution to unmet needs. If 4500 dwellings are not met the GMMCHMA shortfall will not be met in full. Thus could have serious implications for the LDC plan given the clear expectations that the wider HMA authorities have of LDC delivering 4,400 dwellings and would give rise to claims LDC have not complied with Duty to Cooperate. there is urgent need for LDC to plan for this need. Other authorities in the HMA are not contributing to unmet need, there is urgent need for all HMA authorities including LDC to plan for meeting the unmet need asap. it is considered essential that the LDC local plan is flexible and can be responsive to the further unmet needs that will arise from the black country and potentially Birmingham in the latter part of the plan period. the best way to ensure the plan can respond is to have sufficient housing and allocated and readily available to contribute to needs. 6000 dwellings should be planned for addressing unmet need (4500 dwellings for up to 2031 and 1500 for emerging need post 2031.</p> <p>The settlement hierarchy is generally supported, concerns are raised however in respect of criteria used to assign settlements to various levels, the weighting is disproportionately tilted to accessibility via public transport. Commuting is one of the largest generators of trips within LDC (settlement sustainability study 2018) table 5.6 of the plan review shows which mode of transport people use on their communities, only 1.4% of all commutes are completed on the bus and 3.8% by all methods of public transport. considering this there is not sufficient justification to with settlements with bus services at expense of those without as statically very little of the population will even use them. Only Shenstone benefits with access to a train station, nationally bus services are reducing particularly in rural areas, meaning people using buses are likely to reduce over the plan period, weakening the rationale. it is considered that proximity to larger centres should be attributed more weight. whilst Harlaston is not the most sustainable location it does benefit from being 5 miles of Tamworth. reducing journey lengths will reduce miles travel when bus services will not be used. Shorter distance are also likely to encourage walking and cycling which accounts for 6% of journeys within the district. the adopted methodology risks isolating sustainable settlements from new development have consequences such as an ageing population and closure of services and facilities. Places like Harlaston need to be given further consideration.</p> <p>Harlaston is close to a number of key centres and superfast broadband is available in Harlaston which provides opportunity for residents to work from home and reduce commuting. locating development in Harlaston would not impact upon sustainability. the methodologies used to outline new areas of growth are often outdated when used to rank settlements and do not reflect modern life. The delivery of half of the Districts growth to a</p>	No changes required.	Comments noted, the proposed strategic housing allocations and wider housing delivery policies and strategies utilising a broad range of evidence bases the demonstrate sites and allocations are suitable and appropriate to deliver within the plan period.
LP2040 91	Angela Smedley	SP11	No	No	No	yes	yes	<p>It is agreed that there are exceptional circumstances that exist within the district and wider HMA to justify green belt release in the West Midlands Green Belt. LDC;s approach does not go far enough In regards to sensible growth in the rural areas to support services and facilities in like with the councils visions and objectives. green belt release should only be achieved on land which does not perform strongly against the five purposes of the green belt. the Council should be delivering a higher amount of housing and therefore require additional green belt release to facilitate additional residential allocations. land at Whittington Heath is suitable for a new settlement.</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.
LP2040 92	Angela Smedley	SP12	No	No	No	yes	yes	<p>A region of 6,000 dwellings should be planned for addressing the unmet need (4,500 dwellings up to 2031 and 1,500 dwellings for needs emerging post 2031) creating a total housing requirement of 13,062 dwellings to be delivered over the plan period. Strategic policy 12 directs the majority of growth 3,300 dwellings to an allocation to the north east of Lichfield. Within the remaining rural areas residential development is proposed to be limited to infill development within the village settlement boundaries. the allocation of 3,300 dwellings puts the whole plan at risk and development should be directed to the lower order settlements in order to better reflect the role of these settlements, ensure their vitality and viability and to provide a greater mix of housing sites and market choice. furthermore, there is concern to only allowing limited infill development within villages will mean than any new development will mean that any new development will be likely be small and piecemeal in nature. small developments fall below thresholds for affordable housing and S106 contributions. this means that the population will grow without the requisite funding for infrastructure. Infill schemes are les likely to be able to deliver a good range of house types and sizes. infill development can also damage character and can serve to urbanise existing villages by removing green and open spaces. Without growth the council risk the long term longevity of such services and facilities, having an overall detrimental impact on sustainability.</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.
LP2040 93	Stephen Stoney	SHA3	Yes	No	No	yes	yes	<p>Supportive of SHA3. The matter of legality arises in respect of the proposed local plan policies seeking to impose a regime on development that differs from the imposed by section 38 appeal decision ref APP/K3415/W20/3264280. This undermines the soundness of proposed local plan policies.</p> <p>Local Plan is not consistent with APP/K3415/W20/3264280.</p> <p>The trajectory portrayed needs a strong section of explained deliverability which is not provided.</p>	No changes required.	It is noted that outline planning permission for part of proposed allocation has been permitted. Outline permission relates to access only. Policies within the adopted plan at the time of any reserved matters application will be used when determining planning application. Appendix A of the plan includes an indicative housing trajectory for the plan period. This is supported by evidence within the Five Year Housing Land Supply and Strategic Housing Land Availability Assessment.
LP2040 94	Philippa Kreuser	SP11	Unanswered	Unanswered	No	Yes	Yes	<p>Objection is specifically made to the deletion of the previous policy intent to allocate ADR land across the district in the plans strategic green belt policy and deletion of the proposed ADR site known as Fosseyway Lane Lichfield from the policy and from the proposals map. The LP 2040 should make provision for ADR safeguarded land in accordance with the NPPF para 143. LDC have previously acknowledged and promoted the need for land to be removed from the Green Belt and reallocated as ADR land through the local plan review. Policy ONR1: Green Belt in the preferred options local plan (Nov 2019) set out that ADR would due created at 3 specific locations, including land at Fosseyway lane, Lichfield, and this policy intent was carried forward in policy SP11: protecting green belt land in the draft proposed submission plan. unclear why proposals to allocate ADR land have been withdrawn and lacks the transparency expected from a public body.</p> <p>Previous incarnations of the draft local plan suggest that Lichfield council did have the evidence and justifications to support its proposal to remove land from the green belt and allocate it as ADR/safeguarded land. Para 143e of the NPPF requires that local plans should be able to demonstrate the green belt boundaries will not need to be altered at the end of the plan period. this is particularly relevant when the council has chosen a development strategy that relies on only 4 new housing allocations to deliver some 4675 new homes, if one or more sites do not come forward in time the numbers for Lichfield may not be delivered in time. the allocation of ADR land, including land at Fosseyway Lane would provide the local planning authority with a degree of flexibility and certainty that alternative lanes is available for development within and beyond the plan period if the strategic housing allocations fails to deliver or the authority can't demonstrate a 5 year land supply.</p>	No changes required.	Safeguarded land is not considered to be required within the Local Plan 2040, particularly given Governments stated intent to introduce new planning system.
LP2040 95	Philippa Kreuser	SP11	Unanswered	Unanswered	No	Yes	Yes	<p>Objection is specifically made to the deletion of the previous policy intent to allocate ADR land across the district in the plans strategic green belt policy and deletion of the proposed ADR site known as Fosseyway Lane Lichfield from the policy and from the proposals map. The LP 2040 should make provision for ADR safeguarded land in accordance with the NPPF para 143. LDC have previously acknowledged and promoted the need for land to be removed from the Green Belt and reallocated as ADR land through the local plan review 2040.</p>	No changes required.	Safeguarded land is not considered to be required within the Local Plan 2040, particularly given Governments stated intent to introduce new planning system.

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LP2040 96	Denise Burrows	SHA2	No	No	No	Yes	N/A	LDC has not worked with other local authorities or the local community to select SHA2. LDC has ignored objections of SHA2 by the community that took place in 2019/2020. The plan does not comply with NPPF on protecting green belt, SHA2 too is in green belt and the local plan does not justify 800 homes in the green belt. a traffic assessment at Mile Oak is missing and the 2019 Green Belt review has not been interpreted correctly. Allocation of SHA2 west of mile Oak does not meet several strategic objectives and priorities set out in the sustainability appraisal. LDC has not consulted properly with the local community or considered the impact of the development on Tamworth residents. Brownfield sites should be chosen before green belt, SHA2 is in green belt so is not suitable. Objections of SHA2 have been ignored.  LDC have not properly considered all reasonable alternatives to SHA2. Before allocated traffic assessments, impact on local infrastructure and high school places should be considered. SHA2 is too big when compared to the size to the existing Fazeley ward. Local Plan is not effective or deliverable over the plan period as the infrastructure requirements and implications of SHA2 have not been fully considered - traffic on A353 and other infrastructure requirements. The LP 2040 and allocation of SHA2 not consistent with NPPF - Section 2, Section 5, Section 8, Section 13, Section 14, Section 15. Remove SHA2 from LP 2040 and allocate another large site not in the green belt and closer to train station.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered.
LP2040 97	Philippa Kreuser	Whole document	N/A	N/A	No	Yes	Yes	<ul style="list-style-type: none"> <li>Support the principle of a large scale housing allocation to the north east of Lichfield in Strategic Policy 1 : The Spatial Strategy</li> <li>Object to the extent of the housing allocation to the north east of Lichfield</li> <li>Support the retention of land at Corporation Farm, Watery Lane, Curborough, Lichfield as open countryside rather than Green Belt</li> </ul> <p>Propose that the Proposed Publication Document should be amended to include land at Corporation Farm, Watery Lane, Curborough. The proposed SHA1 allocation is supported however the above mentioned parcel of land should also be included to provide an additional 800 units.</p> <p>If Lichfield District Council is to stand any reasonable prospect of achieving its housing delivery of between 321-526 new homes per year over the Plan period it needs to identify more than the 4 sites allocated at Strategic Policy 12: Housing Provision. If one or more of these allocation sites is delayed in coming forward, then there is a risk that the housing requirement of Lichfield will not be delivered on time. In such circumstances, it is submitted that there is a need to identify additional Strategic Housing sites so as to spread the risk of a shortfall in housing delivery should one or more sites be delayed in coming forward.</p>	No changes required.	Comments noted, sites have been assessed against relevant criteria and deliverability which meets the needs for the time frame of the plan.
LP2040 98	Edward Fox		N/A	N/A	N/A	N/A	N/A	<p>South Staffordshire Council has concerns with the approach adopted by LDC in making a contribution of 2,665 dwellings addressing the shortfall in housing provision arising within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). it is considered that this is not sufficient to meet the needs of the HMA and is likely to push housing delivery to other less sustainable locations in the HMA. the original contribution of 4500 dwellings is considered a more suitable contribution than the proposed 2665. the fall in contribution has not been fully justified and there is no duty to cooperate statement in place to substantiate the approach taken. The plan looks only to provide a contribution to the unmet needs of GBBCHMA from 2027. The NPPF does not suggest that earlier contribution to needs will not help to meet future needs, and therefore the approach of delaying contribution to the GBBCHMA is not justified. the LDC plan sets out housing provision over the plan period at 13,300 providing a buffer for flexibility is a relatively high amount, more of this could realistically be used to contribute towards the needs of the HMA.</p> <p>It is noted that only 1 of the 3 recommended areas for housing contribution in the GBBCHMA strategy growth study 2018 is being fully delivered. the site north of Tamworth only delivers 1083 dwellings which already appears in adopted plans, it is not understood why consideration has not been given to the original 1500-7500 dwellings envisaged for this location the strategic growth study.</p> <p>Authorities with new settlement recommendations should be assessing locations for a new settlement or alternative options now. The plan should look to offset significant loss of supply elsewhere in the District, for example with alternative shortlisted sites the strategic growth study identified, and increase delivery north of Tamworth to deliver 4,500 homes. Lichfield should demonstrate why strategic growth study area are not deliverable before concluding that a higher contribution to GBBCHMA unmet need is not possible.</p> <p>South Staffs council has concerns regarding the lack of indication of a potential role that LDC have in meeting employment land shortfall of the black country. This needs to be addressed with a shortfall in 210 ha of employment land , LDC has been listed by the Back Country as an area of moderate economic transaction within the Black Country.</p> <p>South Staffs Council does support the approach identified within the consultation document towards protecting the integrity of the SAC. it is suggested however than consideration be given to amending the reference in the policy to a 'zone of influence' instead of a 15 km radius from the SAC. Sue to the reasons set out above LDC does not meet the soundness test set out in Para 35 of the NPPF the plan fails to demonstrate- 1) Positively prepared - plan has not maximised opportunities to sustainably accommodate the unmet needs of neighbouring authorities, failing to need needs based on recommendations of GBBCHMA strategic growth study 2018. 2) Justified: we have concerns that the plan has not provided sufficient evidence to demonstrate an appropriate strategy for addressing cross boundary needs and not maximised the locations suggested in the GBBCHMA strategic growth study to meet housing needs or justified why alternatives have not been considered. the plan does not currently set out the councils stance regarding the emerging black country employment shortfall 3) Effective - Lichfield has not engaged effectively with neighbouring</p> <p>Objection is made to the omission of "Areas of Development Restraint (ADR)" in the Lichfield Local Plan 2040: Proposed Publication Document. Objection is specifically made to the deletion of the previous policy intent to allocate ADR land across the District in the Plan's strategic Green Belt policy, and the deletion of the proposed ADR site known as Fosseyway Lane. Consider that Policy SP11: Protecting Green Belt Land of the Lichfield Local Plan 2040 should be amended to include a policy intent for the allocation of ADR land, and to include the identification of land at Fosseyway Lane as an ADR site. This is particularly relevant when the Council has a chosen a development strategy that relies on only 4 new housing allocations to deliver over 4000 homes over the plan period.</p>	No changes required.	<p>Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence.</p> <p>Contribution was decreased following the publication of the latest GBBCHMA position statement (published 2020) which indicated that BC shortfall emerges from 2027/28 and consideration of the housing trajectory in relation to historic growth levels of the District.</p> <p>It should be noted Lichfield District Council has already accommodated 1000 homes to meet needs from within the HMA within its adopted Local Plan. Strategic Growth Study forms part of the evidence base to the Local Plan. Options within the study have been tested and considered through the plan-making process.</p> <p>Local Plan 2040 identifies sufficient employment land to meet the District's employment land requirements. The plan, and supporting evidence, not there is limited land availability to deliver beyond those requirements and as such the council is not able to assist in meeting unmet employment land needs.</p>
LP2040 99	Philippa Kreuser	SP11	N/A	N/A	No	Yes	Yes	<p>Objection is made to the deletion of the previous policy intent to allocate ADR land across the District in the Plan's strategic Green Belt policy, and the deletion of the proposed ADR site known as Fosseyway Lane. Consider that Policy SP11: Protecting Green Belt Land of the Lichfield Local Plan 2040 should be amended to include a policy intent for the allocation of ADR land, and to include the identification of land at Fosseyway Lane as an ADR site. This is particularly relevant when the Council has a chosen a development strategy that relies on only 4 new housing allocations to deliver over 4000 homes over the plan period.</p>	No changes required.	Safeguarded land is not considered to be required within the Local Plan 2040, particularly given Governments stated intent to introduce new planning system.
LP2040 100	Philippa Kreuser	Whole document	Unanswered	Unanswered	No	Yes	Yes	<p>Object to Strategic Policy 1: The Spatial Strategy and the inclusion of Stonnall as a Level 4: Smaller Service Village; it is submitted that Stonnall should be included within Level 3 – Larger Service Village. Consider 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. If Lichfield District Council is to stand any reasonable prospect of achieving its housing delivery. The reliance of the large scale housing allocations in the Local Plan Strategy which take a long period of time to deliver dwellings. The Proposed Publication Document continues to rely on such large scale allocations.</p>	No changes required.	Settlement hierarchy within Local Plan 2040 is based upon evidence including Settlement Sustainability Study.
LP2040 101	Andrew Dobson (Apus Projects Ltd) for Mary Lou Lees	Whole Document	No	N/A	No	Yes	No	<p>Birmingham and the Black Country are undertaking reviews of their Plans and whilst the Lichfield Local Plan 2040 purports to have complied with the cooperate the evidence base is already updated and the Local Plan should reflect the greater significant unmet housing need already determined.</p> <p>A robust positive approach to identify reserve housing sites that may be required during the Plan period would be appropriate. The function of reserve sites and the circumstances that would be necessary to consider their being brought forward should be set out expressly in the Plan.</p> <p>Flexibility should be provided in the Plan for alternative sites to be considered for development in certain circumstances.</p>	No changes required.	Comments noted. Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence.
LP2040 102	Philippa Kreuser	Whole document	Unanswered	Unanswered	No	Yes	Yes	<p>Support the inclusion of Armitage with Handsacre as a Level 3 – Larger Service Village in the Settlement Hierarchy as set out in Table 4 to Strategic Policy 1: The Spatial Strategy. Armitage with Handsacre comprises a Key Village in Lichfield District. Object to the failure of the Proposed Publication Document to identify Armitage with Handsacre as a location for a new housing allocation in Strategic Policy 12: Housing Provision. The village is a highly sustainable, and a new residential development is entirely appropriate and a new residential development is entirely appropriate if Armitage with Handsacre. SP12 should be amended to include an allocation within the settlement of Armitage with Handsacre.</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.

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LP2040 103	Philippa Kreuser	Whole Document	Unanswered	Unanswered	No	Yes	Yes	Support the inclusion of Shenstone as a Level 3 – Larger Service Village in the Settlement Hierarchy as set out in Table 4 to Strategic Policy 1: The Spatial Strategy. Shenstone is a most sustainable settlement providing a range of services and facilities. Therefore object that policy SP12 does not seek to allocate housing within Shenstone. Furthermore, to ensure appropriate amount of housing delivered over the plan period the Local Plan 2040 should not solely rely on 4 large scale allocations for housing	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.
LP2040 104	Roger Chance	Whole document	No	No	No	Yes	No	The forms, including these ones are written in the typical local government legalese, difficult to understand. The Local Plan requires a traffic survey on the A453/ A5127 at Mile Oak and surrounding areas. The traffic at A5/M42 junction is chaotic. Noise is also a problem. Public transport is poor or non-existent. Far too many houses for the area in question considering extra housing is planned for Cannock, Brownhills, Lichfield, Fazeley, Tamworth and Atherstone. Will future generations have any green spaces.  An extra 800+ houses onto Fazeley ward is a huge % increase, considering there are going to be 900 flats in Fazeley Mill. The local school at Rawlett is already at full capacity and 2000 extra cars on the road will cause chaos. Not enough consideration has been given to climate change. The IPCC said last week that too many cars, too many houses are adding to global warming. There are already 750 extra houses at Dunstall Park (Tamworth) which is only 1 mile from Mile Oak.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Further transport evidence is in the process of being undertaken following delay caused by the Coronavirus pandemic.
LP2040 105	Philippa Kreuser	Whole document	Unanswered	Unanswered	No	Yes	Yes	Support the inclusion of Whittington as a Level 3 – Larger Service Village in the Settlement Hierarchy as set out in Strategic Policy 1 : The Spatial Strategy in the Proposed Publication Document. Support the identification of Whittington as a location for a new strategic housing allocation as set out in Strategic Policy 12 : Housing Provision.  Additional allocations within sustainable settlements within the hierarchy would assist in housing delivered over the plan period the Local Plan 2040 should not solely rely on 4 large scale allocations for housing. Site at Back Lane is in a more sustainable location within the village and have a lesser impact upon the conservation area and less intrusive to green belt.	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.
LP2040 106	Philippa Kreuser	Whole Document	Unanswered	Unanswered	No	Yes	Yes	Support the principle of a large scale housing allocation to the north east of Lichfield in Strategic Policy 1: The Spatial Strategy. Object to the exclusion of Land at Curborough Grange, Netherstowe from the housing allocation as identified on Inset 1 and Figure 3 to Policy SHA1 : North of Lichfield Strategic Housing Allocation.	No changes required.	Support noted.
LP2040 107	Dawn Dwyer	SHA2	No	No	No	Yes	Yes	LDC have ignored hundreds of objections to SHA2 raised by the local community and there has not been enough consultation with other local councils.  It does not comply with national planning policy on protecting Green Belt Land as SHA2 is in the Green Belt. The Local Plan is unsound as the exception reasons to justify 800 homes in this location in the Green Belt are not set out in the Local Plan. There are no traffic assessment at Mile Oak, current traffic problems are already bad enough. The results of the 2019 Green Belt Review have not been interpreted correctly. The allocation of SHA2 fails to meet strategic objectives and priorities set out in the Sustainability Appraisal.  Brownfield sites and sites not in the Green Belt should be chosen before SHA2. No consideration has been given that HS2 rail link is in the process of construction in close proximity to the development. SHA2 should not have been selected before gathering all evidence such as traffic assessments, impact on local infrastructure including in Tamworth and high school places. SHA2 is too big when compared to the existing Fazeley ward. Allocations in Burntwood comprise only 4% of dwellings, compared to 29% for smaller settlement which is not proportionate.  <del>The Local Plan 2040 and allocation of SHA2 is not consistent with Sections 2, 5, 8 and 13 of the NPPF.</del>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.
LP2040 108	Philippa Kreuser	Whole Document	Unanswered	Unanswered	No	Yes	Yes	Consider that Strategic Policy 12: Housing Provision should be amended and Policy SHA2 Land west of Fazeley, Mile Oak and Bonehill should be deleted and in its stead Land at Sutton Road, Fazeley should be allocated as a Strategic Housing site for 800 dwellings and identified accordingly on Inset 11 to the Plan. Support the principle of a Strategic Allocation at Fazeley, Mile Oak and Bonehill in Strategic Policy 1: The Spatial Strategy. Object to the Strategic Housing Allocation for 800 dwellings on Land West of Fazeley, Mile Oak and Bonehill in Strategic Policy 12: Housing Provision. Object to the inclusion of Land at Sutton Road, Mile Oak, Tamworth within the Green Belt. Green Belt boundaries should be consistent with the Local Plan strategy for meeting identified development requirements for sustainable development. The boundaries should be set to meet longer term development needs stretching well beyond the Plan period. The proposed boundaries for Green Belt should follow readily recognisable features.  Concerns with the site SHA2 is that the boundaries chosen are not readily recognisable or defensible; if this site is deleted from the Green Belt then there will be a risk that the Council will be unable to resist pressure to expand.	No changes required.	Site is selected having regard to evidence base in Green Belt study and because exceptional circumstances exist to meet identified housing need.
LP2040 109	Jack Robinson (Severn Trent)	Whole Document	Unanswered	Unanswered	Unanswered	Yes	Unanswered	Support strategic objectives with regards to climate change and infrastructure. Support the spatial strategy focusing growth in major settlements where infrastructure in these location are likely to be tolerant to increased demand. Support provisions within infrastructure and healthy lifestyles chapter with regards to sewerage infrastructure. supportive of the districts approach to focus housing delivery on sustainably located brownfield sites and re-use land, alongside smaller infill development, these locations often have some existing infrastructure provisions making them easier to accommodate.  With regards to the proposed strategic housing allocations a detailed table within the submitted comments details a RAG rating for each site in relation to sewerage and surface water. It should be noted that sites flagged as high risk are not "show stoppers" but may require site specific policy or new infrastructure provision in order for them to progress sustainably.  Strategic policy SHA1 - ask that some form of phase plan and master planning strategy be supplied for this site so we can ensure that infrastructure provisions can be met. Whilst it appears clear that sustainable options exist for managing surface water, depending on the drainage layout on site, and how it is phased, the foul connections strategy is not obvious.  Strategic policy SHA2 -areas drain towards Tamworth Wastewater Treatment Works (WwTW) which is currently being reviewed holistically alongside Tamworth Borough councils' own proposals through several ongoing capital projects. These ongoing studies will address the demand for sewerage provisions of this allocation and others across Tamworth.  Strategic policy SHA3 - This is allocation which may benefit from a phase plan to ensure that the bigger picture around drainage strategy is considered, it would also help us phase any investment and upgrades required to accommodate the proposals.  Strategic policy SHA4 -We recommend some form of policy wording or predefined surface water strategy/masterplan be implemented to bring this allocation forward sustainably.	No changes required.	Support for policy noted. Policy within the Local Plan 2040 has regard to provision for sewerage and surface water infrastructure have been taken into consideration with relevant evidence base forming part of the local plan.

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LP2040 110	Vivienne Williams	SHA2	No	No	No	Yes	No	<p>LDC has not worked with local councils or local community to select strategic sites. LDC have ignored hundreds of objections to SHA2 raised by local community in the preferred options consultation exercise.</p> <p>The plan does not comply with NPPF policy on protecting green belt land as SJA2 is in green belt. The LP is unsound as exceptional reasons have not been justified for 800 homes in this location in the green belt are not set out in the LP. a traffic assessment is absent at Mile Oak. The results of 2019 Green Belt review have not been interpreted correctly. The allocation of SHA2 does not meet several strategic objectives and priorities set out in Sustainability appraisal. The council has not consulted properly with local community or considered impact of SHA2 on surrounding area.</p> <p>Brownfield sites and sites not in green belt should be chosen before SHA2 green belt countryside is not in a suitable or sustainable location.</p> <p>The council have not properly considered all reasonable alternatives to SHA2 which is in Green Belt. further evidence is required such as: a traffic assessment, impact on local infrastructure, impact on school places, SHA2 is too big when compared to size of Fazeley ward, allocations in Burntwood only comprise of only 4% of homes compared to 29% of smaller rural settlements such as SHA2 this is not proportionate or fair.</p> <p>local plan is not effective or deliverable over the plan period as the infrastructure requirements and implications of SHA2 have not been fully considered, for example traffic on A453. SHA2 is in the green belt which is contrary to NPPF policy other sites should be selected before a green boundary change is proposed at Mile Oak.</p> <p>LP 2030 and allocation of SHA2 is not consistent with NPPF: Section 2, Section 5, Section 8, Section 13, Section 14, Section 15</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered.
LP2040 111	Alex Yendole	Whole document	Yes	Yes	Yes	Yes	No	<p>Stafford is a neighbouring authority to LDC, the development strategy could have development and infrastructure implications for the borough, although it is worth noting that Stafford Borough is not in the GBBCHMA or the GBSLEPA. The Lichfield Districts housing need is calculated in accordance with the standard approach set out in the Governments planning guidance is 9,727 dwellings between 2018 and 2040 within which there are 2,665 homes as a contribution to meet unmet housing need from Greater Birmingham and Black Country. In this regard appropriate mitigation for impacts on the SAC will need to be secured, with SBC continuing to work with LDC as part of the SAC. The adopted plan for SBC 2014 focuses the majority of new housing and employment provision at SBC without releasing GB area and a number of significant development sites are not being delivered. SBC has initiated a new local plan for 2020-2040 to set out future development strategy beyond the adopted plan period of 2031 if applicable moving forward it may be important to ensure the infrastructure implications are considered in balance with achieving housing and employment needs across the wider area.</p> <p>Based on District profile and issues identified for LDC, the SBC is generally supportive of the vision, strategic objectives and strategic policies within the publication document, providing place- specific emphasis to provide more clarity through this document and its supporting evidence base. It is important to ensure that a balanced approach takes place between the development requirements of neighbouring areas and focus for new infrastructure, housing and employment growth within LDC area. On this basis SBC is supportive of the publications plans strategic options for growth, this approach is appropriate strategy to ensure future sustainable development by utilising existing and new infrastructure provision whilst minimising impact on WM green belt. sac is aware of the sustainable extensions to Rugeley alongside development in the neighbouring district of Cannock Chase.</p>	No changes required.	Support noted.
LP2040 112	Maureen Swinburn	Whole document	No	No	No	No	No	Object to SHA2 allocation, does not have support of Fazeley Town Council and Tamworth Borough Council. No support from local residents either as seen during preferred options consultation which have been ignored. SHA2 is in the Greenbelt it does not comply with the NPPF to protect green belt land. In the latest review of the greenbelt, development of this site would 'represent an encroachment into the countryside'. Exceptional reasons to justify building 800 homes on this greenbelt site have not been demonstrated. This site should not have been selected as brownfield sites should have been explored first. Concerns with regards to the lack of a traffic survey and air pollution assessment has not been completed to justify this planned development being included in the Local Plan.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.
LP2040 113	Debra Viera	SHA2	No	No	No	No	No	Concerned regarding the large scale development proposed for Fazeley, specifically this impact on local infrastructure and the green belt.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.
LP2040 114	Stephen Smith	SHA2	N/A	N/A	N/A	N/A	N/A	Objects to SHA2. Traffic is far too busy with current traffic especially with Ventura Park. Water pressure is already bad at Mile Oak and will get worse with more houses.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.



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LP2040 115	Claire Tucker	SHA2	No	No	No	Yes	No	<p>SHA2 was selected by LDC without support from Fazeley Town Council and Tamworth Borough Council. Hundreds of objections to this proposed site with a petition of well over 1000 signatures have been ignored. The council has failed their duty to hold consultation at a suitable time as it coincides with school holidays when most people are away.</p> <p>SHA2 is in the green belt and therefore does not comply with national planning policy to protect green belt land. the development would represent an encroachment into the countryside, exceptional reasons to justify building 800 homes have not been shown in the local plan. The evidence base is incomplete as the traffic survey and air pollution assessment has not been completed. Incorrectly interpreted the results of the 2019 Green Belt review and mistakenly consulted that parcel land FZ1 is suitable for Green Belt release. The allocation of SHA2 will not be well associated with existing settlements and services and will only be easily accessible to facilities at Fazeley by car, there is no provision for improving local amenities, not a sustainable allocation.</p> <p>SHA2 should not have been selected as brownfield sites should have been explored first. It is not positively prepared as comments from preferred options have been ignored.</p> <p>LDC has not explored other reasonable alternatives to SHA2 as it is in greenbelt. SHA2 proposed development is not proportionate. No traffic assessments conducted, danger to the A453, lack of high school places, incorrect interpretation o green belt review 2019 interpreted incorrectly, disproportionate size.</p> <p>SHA2 is not effective or deliverable as implications of SHA2 not considered. HS2 will cause negative impact to the area which hasn't been considered.</p> <p>The local plan 2040 is not consistent with the following sections of the NPPF: protecting green belt land, achieving sustainable development, delivering a sufficient supply of homes, promoting healthy and safe communities, meeting the challenge of climate change, flooding and coastal change, conserving and enhancing the natural environment.</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.
LP2040 116	Kings Bromley PC	Whole Document	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	<p>Overall, we support the comments made concerning Kings Bromley in Paras 15.1 – 15.3. Fully support the comments made in Para 5.19 about improvements to the Hilliard's Cross &amp; Fradley South junction. See the major link from the A515 to the A38 being via Wood End Lane together with the declassification of the A513 through Kings Bromley village.</p> <p>Concerns regarding the limited mention and acknowledgement of HS2 and its impact. Consider that it should be acknowledged somewhere within this Plan should have regards to the work required to be done with HS2 to ensure that the landscape is restored to its previous state.</p>	No changes required.	Support noted. Council has engaged with HS2 ltd at all stages of the progression of the Local Plan process.
LP2040 117	Des Dunlop (D2 Planning) for London and Cambridge Properties Limited	SP1	No	No	No	Yes	Yes	<p>Support is given in principle to the statement that the overall housing is expressed as a 'minimum'. The housing provision should not be viewed as a ceiling and would be viewed as contrary to guidance in the NPPF. Reference is made to the provision of 7,062 dwellings to meet the local housing need in Lichfield District, does not believe that this level of housing provision will actually meet the future open market and affordable needs of the District. The Annual Monitoring Report (AMR) 2020 provides annual affordable housing completions within the District since the adoption of the Local Plan in 2015. In no year since the start of the period have affordable housing completions ever met or exceeded the annual affordable ned set out in the SHMA. In addition, affordable housing completions have never met the need identified in the more recent HEDNA that has informed this emerging Local Plan. There has been a significant under provision of affordable housing within the District over the last 5 years, there is therefore an urgent need for the provision of affordable housing to meet these identified housing needs. Affordable housing completions have, on average, formed only a 15% element of overall supply since the start of the plan period in 2008. The Spatial Strategy suggests that the majority of new housing will be directed to a number of locations inter alia which includes 'Burntwood Town Centre'. However, this policy's directive to support new housing in Burntwood Town Centre is not carried forward in Policy 14 Centres and Policy B2 Burntwood Services and Facilities. This needs to be corrected. The land known as the Blue Hoarded Site should not continue to be reallocated for housing in line with the detailed planning application submitted by Bromford Housing Association and London &amp; Cambridge Properties Ltd that is currently being considered by the Council (App no: 21/00914/FULM). The site should be allocated for residential use. It is important that allocations for Town Centre uses are not retained when they have already failed over a considerable period of time. This is contrary to paragraphs 122 and 123 of the NPPF. Sufficient land still exists at the Olaf Johnson site which can accommodate future Town Centre expansion.</p> <p>It is unclear why Burntwood as the second largest settlement in the District is only accommodation 4% of the housing provision when Rugeley a smaller settlement is accommodating a larger proportion (6%) looking at the settlement hierarchy in Table 4.</p> <p>Burntwood has a number of brownfield opportunities which are eminently suitable for residential development. The development of these sites will ensure the integrity of the Green Belt remains and there would be no detrimental impact on the Special Area of Conservation.</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local Plan 2040 includes policies which seek to deliver increased levels of affordable housing and ensure that development remains viable.
LP2040 118	Des Dunlop (D2 Planning) for London and Cambridge Properties Limited	SP2	No	No	No	Yes	Yes	<p>Support is given to this policy in principle which seeks amongst others to ensure that all new development is well served by an alternative choice of transport modes. If this policy is to be effective, it is imperative that development sites are identified in locations that can take advantage of existing facilities which can be accessed by a range of non car modes.</p> <p>The Local Plan Review recognises that Burntwood is one such location. In this instance there are a number of brownfield sites in Burntwood that are eminently suitable for residential development e.g. Blue Hoarded Site. These sites are close to existing facilities and can be accessed by walking, cycling and public transport. Many are in locations where use of the private care can be minimised.</p>	No changes required.	Support noted.
LP2040 119	Des Dunlop (D2 Planning) for London and Cambridge Properties Limited	SP3	No	No	No	Yes	Yes	<p>Support is given in principle to this policy. However, it will only be achieved if the emerging Local Plan ensures that new development is located in sustainable locations where advantage can be taken of existing (or improved) non car mode travel. Sites in Burntwood (Blue Hoarded Site) in particular are well located to facilitate access by non car modes.</p>	No changes required.	Support noted. Site promoted for development is within the identified town centre boundary. Noted that planning application for development of site refused.
LP2040 120	Des Dunlop (D2 Planning) for London and Cambridge Properties Limited	Local Policy LT1: Parking Provision	No	No	No	Yes	Yes	<p>In setting parking standards for new development, the guidance in paragraph 107 of the NPPF states that account should be taken of: -</p> <p>"a) the accessibility of the development;</p> <p>b) the type, mix and use of development;</p> <p>c) the availability of and opportunities for public transport;</p> <p>d) local car ownership levels; and</p> <p>e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles. a) the accessibility of the development;</p> <p>b) the type, mix and use of development;</p> <p>c) the availability of and opportunities for public transport;</p> <p>d) local car ownership levels; and</p> <p>e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles."</p> <p>Furthermore, the guidance in paragraph 108 of the NPPF should also be taken into account, namely that minimum parking standards should only be set when there is clear and compelling justification.</p>	No changes required.	Comments noted. Local Plan 2040 does not set out parking standards. Parking Standards are contained within supplementary planning documents.

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LP2040 121	Des Dunlop (D2 Planning) for London and Cambridge Properties Limited	SP5	No	No	No	Yes	Yes	Support is given in principle to the policy which requires new development to provide new infrastructure as a result of the development. Suggests that the policy recognises the requisite test in the CIL guidance i.e. paragraph 122 of the CIL guidance (as amended). We also believe that the policy should be amended to reflect the viability of schemes which can hinder the delivery of sites.	No changes required.	Support noted.
LP2040 122	Des Dunlop (D2 Planning) for London and Cambridge Properties Limited	SP10	No	No	No	Yes	N/A	Support is given to the policy in principle particularly criterion 4 which states that: 'Encourage the re-use of previously developed land and the re-use of buildings as a sustainable option, especially the positive contribution that conservation of heritage assets and their settings can make'.  It is imperative that the Local plan carries through this objective and identifies suitable brownfield sites for housing in sustainable locations. Such opportunities exist in Burntwood e.g. the Blue Hoarded site. The Local Plan should carefully consider all brownfield site opportunities for housing in Burntwood and be proactive in bringing them forward for residential development.	No changes required.	Support noted.
LP2040 123	Des Dunlop (D2 Planning) for London and Cambridge Properties Limited	Local Policy SD2: Renewable and Low Carbon energy	No	No	No	Yes	Yes	Support is given to this policy in principle. However, no where does the policy mention the practicalities of providing renewable energy on major development proposals. This is a fundamental issue and the practical problems of providing renewable energy should be factored into the policy.	No changes required.	Support noted.
LP2040 124	Des Dunlop (D2 Planning) for London and Cambridge Properties Limited	SP12	No	No	No	Yes	Yes	The overall housing provision will be calculated using the Government's standard methodology but given that it may change as it is under review, the initial housing provision for Lichfield District will not be known until the Plan is submitted for Examination. It is apparent that Lichfield has not met its affordable housing need since the Local Plan was adopted. Does not believe that if the housing provision is around 9,727 new houses that this will meet affordable housing needs in the future. Accordingly, the housing provision needs to be significantly increased if the Local Plan is serious about meeting its affordable housing targets.  Objections are lodged to the non allocation of land known as the Blue Hoarded Site, Milestone Way, Burntwood for residential use. Representations should be read in conjunction with representations in respect of Policies SP14 Centres and B2 Burntwood Services & Facilities. The land known as the Blue Hoarded site should not continue to be identified within the Town Centre and should be reallocated for residential development. A planning application for the redevelopment of the site for residential development (100% affordable housing) has recently been submitted.  There are also a range of economic, social and environmental benefits which will be provided as part of the proposals: Providing new housing in accessible locations would assist the local economy through construction jobs and jobs in the supply chain as well as retail sales for new domestic products such as carpets and white goods. The proposals would provide local employment opportunities which will create investment and jobs. There are also financial benefits such as the New Homes Bonus and direct construction jobs. Social benefits include meeting an identified affordable housing need and the proposals would help to maintain and enhance the economic viability of shops and services in Burntwood. Environmental benefits include using previously developed land and lies within the urban area of Burntwood. The development has no objections based on flooding, drainage, noise, air quality or cultural heritage.  The allocation of the Blue Hoarded site at Burntwood complies with the three strands of sustainability as outlined in the NPPF.	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Contribution was decreased following the publication of the latest GBBCMA position statement (published 2020) which indicated that BC shortfall emerges from 2027/28 and consideration of the housing trajectory in relation to historic growth levels of the District. Site promoted for development is within the identified town centre boundary. Noted that planning application for development of site refused.
LP2040 125	Des Dunlop (D2 Planning) for London and Cambridge Properties Limited	SP14	No	No	No	Yes	Yes	The current Local Plan Strategy Core Policy 8 (Our Centres) sets out a positive framework for development within Burntwood Town Centre along with Local Plan Allocations Policy Burntwood 3 (Burntwood Economy). Burntwood Town Centre has failed to attract investment. The overall objective of the Local Plan is to redevelop and regenerate Burntwood Town Centre "to create a key focal point for the area". In this way, the Policy has regard to national policy and is in general conformity with the strategic policies of the development plan. However, as currently presented, by limiting the range of uses within specific parts of Burntwood Town Centre, Policy SP14 appears prescriptive and inflexible. Burntwood Town Centre is not currently thriving. Paragraph 85 of the NPPF requires planning policies to 'recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites'.  Objections to the policy as presently worded are made as they do not include residential use within the Town Centre. In any event, we believe that the Town Centre boundary should be redrafted so that land known as the Blue Hoarded site is removed from the Town Centre and identified for residential use.	No changes required.	Policy within the Local Plan 2040 supports development for town centre uses within the identified town centre boundary. This is supported by the plan's evidence base. It is also noted the recently adopted Burntwood Neighbourhood Plan identifies the town centre as an area where support for town centre development is given. Site promoted for development is within the identified town centre boundary. Noted that planning application for development of site refused.
LP2040 126	Des Dunlop (D2 Planning) for London and Cambridge Properties Limited	Chapter 13: Burntwood (Vision for Burntwood)	No	No	No	Yes	Yes	Support is given to Burntwood being maintained as a separate and freestanding community which offers a range of services and facilities to meet residents, businesses and visitors needs. In looking forward however, it is important that additional land is identified for residential development particularly on brownfield sites. London & Cambridge Properties control land at Milestone Way which is ideally placed for a well designed residential development.  The site has been allocated for uses for over 35 years and has not come forward. London & Cambridge Properties believe that the time has arrived that this site should be deallocated for Town Centre uses and reallocated for residential development. They own further land in Burntwood i.e. Olaf Johnson site which they believe is also identified for Town Centre uses. This site is extremely well located to the existing Town Centre.  It is noted that an Area Action Plan is being prepared for Burntwood. It is however imperative that this Local Plan sets out clearly the objectives for the preparation of any Area Action Plan and that the important decisions are not left for that Area Action Plan.	No changes required.	Policy within the Local Plan 2040 supports development for town centre uses within the identified town centre boundary. This is supported by the plan's evidence base. It is also noted the recently adopted Burntwood Neighbourhood Plan identifies the town centre as an area where support for town centre development is given. Site promoted for development is within the identified town centre boundary. Noted that planning application for development of site refused.
LP2040 127	Des Dunlop (D2 Planning) for London and Cambridge Properties Limited	Local Policy B1: Burntwood Environment	No	No	No	Yes	Yes	Support is given to this policy in principle. It is recognised that within proximity of the settlement is the Cannock Chase AONB and Special Area of Conservation. However, on that basis the Local Plan should be proactive and identify various brownfield sites in Burntwood for future residential development e.g. Blue Hoarded site. In this way the Local Plan will meet future development needs without impinging on these environmental assets.	No changes required.	Local Plan 2040 supports the redevelopment of brownfield sites. Site promoted is within the identified town centre boundary. Noted that planning application for development of site refused.

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LP2040 128	Des Dunlop (D2 Planning) for London and Cambridge Properties Limited	Local Policy B2: Burntwood Services and Facilities	No	No	No	Yes	Yes	<p>Objections are lodged to the continued allocation of land known as the Blue Hoarded site, Milestone Way, Burntwood for Town Centre Expansion.</p> <p>Paragraph 122 and 123 states that: 'Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan: a) it should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped)...'. The NPPF is clear that where land had been allocated for a use which has not come forward that the Planning Authority should take a proactive role in reallocating the site for a more deliverable use that can help address identified needs.</p> <p>The site has been allocated for Town Centre purposes continuously for over 35 years. The land owners have promoted a variety of retail and leisure schemes on the site not just in isolation but in combination with other land they own. In addition, they have also looked at the possibility of a new doctors surgery on the site but this was rejected by the NHS and County Council in favour of a site at Cherry Close, Burntwood. The recently 'made' Burntwood Neighbourhood Plan recognises the position with attracting retailers to the Town Centre.</p> <p>The time has now come for the Planning Authority to consider alternative uses which would meet an identified need. A residential use is more appropriate on the site and would help meet an identified need. If the Council are concerned about expansion of the Town Centre, the objectors own land at the Olaf Johnson site which is well placed to expand the Town Centre with a range of uses. Indeed, this site is better located than the application site for Town Centre expansion. Indeed, planning permission was granted for a retail scheme on the site in 2017 under Application No. 16/01379/FULM.</p>	No changes required.	Local Plan 2040 supports the redevelopment of brownfield sites. Site promoted is within the identified town centre boundary. Noted that planning application for development of site refused.
LP2040 129	Hannah Price (Fisher German) for GR Hemus	Whole Document	No	Unanswered	No	Yes	Yes	<p>Concerned that the quantum of unmet need the Council are planning for is too low and not evidenced clearly. Concerns regarding the implications for the Lichfield District Plan, given the clear expectation that the wider HMA authorities have of Lichfield delivering 4,500 dwellings and could give rise to claims that the Council have not complied with the Duty to Cooperate. Consider there is an urgent need for the Council to consider allocating further housing sites to help meet the GBBCHMA unmet need in the short term.</p> <p>Concerns regarding settlement hierarchy within is the criteria within Strategic Policy 1 used to assign settlements to the various levels and also how growth is distributed to the various levels.</p> <p>Within the remaining rural areas residential development is proposed to be limited to infill development within village settlement boundaries or reliance on support by local communities identified through Neighbourhood Plans. Concerns that currently no individual settlement targets are identified for any of the villages meaning there is no clear housing requirement for Neighbourhood Plan groups to aim for when writing policies which deliver or restrict housing.</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.
LP2040 130	Marc Hourigan	SP1	Unanswered	Unanswered	No	Yes	Yes	<p>Anwyl land limited objects to Policy SP1 on the basis that the policy fails to adequately meet unmet need within the greater Birmingham and black country housing market area up to 2040. It is not positively prepared in respect of meeting the needs of the GBBCHMA up to 2040. There are more homes that will need to be accommodated due to the uplift in the standard methodology. it is clear that the significant unmet need in the HMA up to 2040 will be dealt with by the constituent's councils. The plan appears to defer matters regarding joining working with cross-boundary strategic housing matters.</p> <p>SP1 is not consistent with national policy and is unsound as it is not consistent with paras 24 to 27, para 31, Para 61 and para 61.</p> <p>over seven times the amount of growth is directed to the service villages compared to Burntwood which is the largest settlement in the district after Lichfield. Burntwood has clearly been allocated a disproportionately small amount of housing compared to other order centres and in view of rag 19.Burntwood is the second most sustainable settlement, it appears the site allocation has been rejected due to community resistance to any form of green belt release around the settlement. The allocation of Rake Hill, would not impact on sensitive landscapes and has the ability to create new areas of open space, improvements to wildlife habitat and to create links to existing pedestrian and cycle routes so as to foster sustainable travel patterns.</p> <p>Further development of Burntwood would support the regeneration aim for the town centre by introducing new households who could use local facilities both existing and planned.</p> <p>SP1 is not justified it is not an appropriate strategy as it undermines the vision of the local plan by restricting growth in Burntwood in favour of significantly higher levels of growth in lower order and less sustainable service villages.</p> <p>SP1 is not consistent with para 15 of the NPPD, 16 a) 16 b)</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base. Spatial strategy is considered appropriate and based upon a range of evidence and constraints. This includes, but is not limited to, consideration of environmental constraints, Green Belt review.
LP2040 131	Marc Hourigan	SP12	Unanswered	Unanswered	No	Yes	Yes	<p>Development should be directed to Burntwood town centre, urban area and a strategic housing allocation for up to 200 dwellings on land north of rake hill Burntwood.</p> <p>Objection is made to the housing trajectory referred to in para 8.9 of the supporting text of strategic policy SP12. there is no evidence which illustrates how major sites and proposed strategic allocations are expected to deliver over the plan period. Even after being directed by sources from the council it is unclear how the trajectory has been built. it is considered that the trajectory is unsound in that it is not adequately justified and based upon proportionate evidence.</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base. Spatial strategy is considered appropriate and based upon a range of evidence and constraints. This includes, but is not limited to, consideration of environmental constraints, Green Belt review.

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LP2040 132	Sue Green (Housebuilders Federation)	DIC	No	Yes	No	Yes	Yes	As set out in the 2021 National Planning Policy Framework (NPPF), the Council is under a Duty to Co-operate with other Local Planning Authorities (LPA) and prescribed bodies on strategic matters that cross administrative boundaries (para 24). To maximise the effectiveness of plan-making and fully meet the legal requirements of the Duty to Co-operate, the Council's engagement should be constructive, active and on-going. This collaboration should identify the relevant strategic matters to be addressed (para 25). Effective and on-going joint working is integral to the production of a positively prepared and justified strategy (para 26). The Council should demonstrate such working by the preparation and maintenance of one or more Statements of Common Ground (SoCG) identifying the cross-boundary matters to be addressed and the progress of co-operation in addressing these matters.  To provide communities and other stakeholders with a transparent picture of collaboration, the NPPG sets out that authorities should have a SoCG available on their website by the time of publication of their Draft Plan. The HBF note that there is no SoCG accompanying the Lichfield pre-submission Local Plan consultation.  Position Statement No.3 is not a robust evidence base for the long-term strategic planning of the GB&BCHMA nor sufficient justification for the reduction of Lichfield's contribution to unmet needs from 4,500 dwellings in Position Statement No.3 to 2,665 dwellings in the pre-submission LPR.	No changes required.	The District Council has, and continues to, work with partners through the duty to cooperate including on strategic matters. The authorities within the GB&BCHMA have produced the 2020 Position Statement as part of the evidence supporting their respective local plans and plan-making. Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Contribution was decreased following the publication of the latest GB&BCHMA position statement (published 2020) which indicated that BC shortfall emerges from 2027/28 and consideration of the housing trajectory in relation to historic growth levels of the District.
LP2040 133	Sue Green (Housebuilders Federation)	Strategic Policies SP1, SP11, SP12 & SHA1 – 4 (Housing Land Supply)	No	Yes	No	Yes	Yes	No objection or specific comments with regards to specific allocations or overall hierarchy of settlements within SP1. Notes that an accurate assessment of availability, suitability, deliverability and viability is undertaken. The Councils assumptions on lead in times and delivery rates should be correct and supported by parties responsible for the delivery of housing on each individual site. The HBF support the Council's proposed changes to Green Belt boundaries around Fazeley and Whittington. With regards to housing land supply (HLS) here is a headroom of 3,579 dwellings (27%) between the overall HLS of 13,306 dwellings and Lichfield's housing requirement of 9,727 dwellings. The HBF always advocates as large a contingency as possible to provide optimum flexibility. Housing delivery is optimised by the widest possible range of housing site sizes and market locations, which provides suitable land buying opportunities for small, medium and large housebuilding companies. On SDAs, there may be long lead in times before the commencement of on-site development and build up to optimum delivery rates. The NPPF at least 10% of the housing requirement should be accommodated on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target (para 69a). From the Council's evidence, the number of sites of less than 1 hectare is unclear. Therefore, it is not evident if the LPR is consistent with national policy. The Council's proposed housing trajectory is stepped as illustrated in Appendix A and set out in Strategic Policy 12 (SP12). There is no justification for this deferment. Housing need is arising now, which should be met and not deferred until later in the plan period.	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Contribution was decreased following the publication of the latest GB&BCHMA position statement (published 2020) which indicated that BC shortfall emerges from 2027/28 and consideration of the housing trajectory in relation to historic growth levels of the District.
LP2040 134	Sue Green (Housebuilders Federation)	SP1 & SP12	No	Yes	No	Yes	Yes	No justification for the Council's proposed deferred housing delivery. Housing need including unmet housing need in the GB&BCHMA is arising now, it is not staggered. The meeting of housing need should not be deferred. As set out in the latest NPPF, strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period (para 66). The determination of the minimum number of homes needed should be informed by LHN assessment using the Government's standard methodology unless exceptional circumstances justify an alternative approach (para 61). In Lichfield, there are no exceptional circumstances to justify an alternative approach. The NPPG clearly states that the standard methodology is the minimum starting point in determining the number of homes needed. It is important that the housing needs of Lichfield are not under-estimated. The NPPG explains that "circumstances" may exist to justify a figure higher than the minimum LHN. The HBF note that there is no uplift from the minimum LHN starting point to support economic growth. The 2021 NPPF seeks to achieve sustainable development by pursuing economic, social and environmental objectives in mutually supportive ways (para 8). The Council should be seeking to support the long-term sustainability of the District by achieving a sustainable balance between employment and housing growth. The Council should recognise economic benefits of housing development in supporting local communities. The HBF acknowledge that the Council may not be able to meet all affordable housing needs but a housing requirement above the minimum LHN will make a greater contribution to delivering more affordable housing. LDC should aspire within the plan period to deliver housing requirement above the minimum LHN would support economic growth, deliver more affordable housing and make a greater contribution to unmet housing needs in GB&BCHMA.	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Contribution was decreased following the publication of the latest GB&BCHMA position statement (published 2020) which indicated that BC shortfall emerges from 2027/28 and consideration of the housing trajectory in relation to historic growth levels of the District.
LP2040 135	Sue Green (Housebuilders Federation)	SP3 & LT1	No	Yes	No	Yes	Yes	HBF consider that the physical installation of active EVCPs is inappropriate. The Council's policy approach of encouragement should be unambiguous in its support for passive cable and duct provision. The HBF have serious concerns about the capacity of the existing electrical network in the UK. Furthermore, Policy LT1 also requires that development proposals make appropriate provision for off-street parking in accordance with parking standards set out in Supplementary Planning Documents (SPD). The Council's requirements should be set out in sufficient detail to determine a planning application without relying on, other criteria or guidelines set out in a separate SPD. National policy clearly defines the scope and nature of an SPD in the planning process as providing more detailed advice and guidance on adopted Local Plan policies. The NPPG confirms that an SPD cannot introduce new planning policies nor add unnecessarily to the financial burdens on development (ID: 61-008-20190315). This reference should be deleted.	No changes required.	Local Plan includes policies with regards to climate change and reducing carbon footprint. This includes encouraging the installation of electric vehicle charging points in development. This is supported by the Council's evidence base, including the Staffordshire Climate Change study.
LP2040 136	Sue Green (Housebuilders Federation)	H1	No	Yes	No	Yes	Yes	To meet the needs of specifically identified groups of households, the Local Plan Review (LPR) should allocate appropriate sites rather than prescribe specific housing mixes for individual sites. The LPR should ensure that suitable sites are available for a wide range of different types of development across a wide choice of appropriate locations. The Council should consider allocating sites for older persons and other specialist housing subject to criteria such as the proximity of sites to public transport, local amenities, health services and town centres. The Council should also consider allocating sites for Self & Custom Build housing. The setting of residential density standards should be undertaken in accordance with the 2021 NPPF (para 125). The proposed "two size fits all" other than in exceptional circumstances policy approach to housing density will not provide development that is in keeping with the character of the surrounding area nor sufficient variety in house typologies to create balanced communities with the right types of new homes to meet the housing needs of different groups.	No changes required.	Local Plan includes policies to ensure homes are delivered to meet the housing need of the District in respect of size and tenure. This is supported by the Council's evidence base. Policy also supports homes to meet specialist needs, including provision of care and accommodation for older persons.



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LP2040 137	Marc Hourigan	SHA2	Unanswered	Unanswered	No	Yes	Yes	<p>Anwyl land limited objects to policy SHA2, the removal of land west of Fazeley, Mile Oak and Bonehill from the Green Belt and its allocation inter alia for approx. 800 dwellings. It is considered that the plan is unsound by directing significant amounts of development to lower order and less sustainable locations than Burntwood.</p> <p>The council seeks to justify the classification for Anwyl Lanes Limited sites as 'moderate' as it adjoins a large built up area i.e. Burntwood. The framework does not define 'large built up area' but para 2.71 of the green belt review 2021 seeks to define them as important for the need to contain outward sprawl. It is the view that the council's definition of large built up areas is arbitrary and unjustified and clearly an assessment of SHA2 would conclude to be large built up areas.</p> <p>The classification of the client's site land forth of Rake Hill has changed from minor to moderate when comparing past green belt studies. Agricultural quality is also a factor and allocation of site at Rake Hill would be preferable.</p>	No changes required.	<p>Local Plan 2040 seeks to plan for the Council's established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. The Spatial Strategy, including proposed allocations, supported by Council's evidence base which informs the site selection process.</p>
LP2040 138	Sue Green (Housebuilders Federation)	H2	No	Yes	No	Yes	Yes	<p>The 2021 NPPF states that policies should be clearly written and unambiguous so that a decision maker knows how to react to a development proposal (para 16d). To be effective, the Council should provide further clarification of its requirements, which should be justified by supporting evidence.</p> <p>It is unclear if the Council's Viability Study has tested an affordable housing tenure mix, which complies with the 2021 NPPF expectation that at least 10% of homes will be available for affordable home ownership (para 65) and the 24 May 2021 Written Ministerial Statement requirement for 25% of affordable housing to be First Homes (see para 2.6.2). The impacts of First Homes on viability should be fully considered. There will be an increased cost to developers selling First Homes in terms of marketing plus an increased risk as they will not be able to sell First Homes in bulk to a Registered Provider thus obtaining a more reliable up front revenue stream. This may result in slow sales of similar open market units, increased sales risk and additional planning costs (if sites have to be re-planned with an alternative housing mix). These impacts should be assessed in the Council's Viability Study by further sensitivity testing.</p>	No changes required.	<p>Affordable housing policy within the Local Plan 2040 seeks to achieve the maximum viable level of affordable homes through development. This is supported by the Council's evidence base including viability work.</p>
LP2040 139	Sue Green (Housebuilders Federation)	SP12	No	Yes	No	Yes	Yes	<p>Under SP12, residential development will be expected to incorporate high-quality design in line with the Council's adopted Supplementary Planning Documents (SPD). To ensure a policy is effective, it should be clearly written and unambiguous so it is evident how a decision maker should react to development proposals. The Council's requirements should be set out in sufficient detail to determine a planning application without relying on, other criteria or guidelines set out in a separate SPD. National policy clearly defines the scope and nature of an SPD in the planning process as providing more detailed advice and guidance on adopted Local Plan policies. The NPPG confirms that an SPD cannot introduce new planning policies nor add unnecessarily to the financial burdens on development.</p> <p>For the Lichfield LPR to be found sound under the four tests of soundness as defined by the 2019 NPPF (para 35), the LPR must be positively prepared, justified, effective and consistent with national policy. Before the LPR is submitted for examination, this reference should be deleted from SP12</p>	No changes required.	<p>Comments noted. Supplementary planning documents will be used to provide detailed advice and guidance in respect of the policies in the Local Plan 2040.</p>
LP2040 140	Sue Green (Housebuilders Federation)	Whole Document	No	Yes	No	Yes	Yes	<p>As stated in the 2021 NPPF, development should not be subject to such a scale of obligations that the deliverability of the LPR is threatened (para 34). Viability assessment should not be conducted on the margins of viability especially in the aftermath of uncertainties caused by the Covid-19 pandemic and Brexit. Without a robust approach to viability assessment, the LPR will be unsound, land will be withheld from the market and housing delivery targets will not be achieved.</p> <p>The Council's viability evidence is set out in Viability Study dated September 2020 by Dixon Searle. Comments on assumptions in the Council's Viability Study:</p> <ul style="list-style-type: none"><li>the generic typology assessments exclude any costs for abnormal, which given the significant proportion of brownfield sites in the Council's HLS is an unrealistic basis for plan wide viability testing. The Council's approach implies that all abnormal costs should be fully deducted from the assumed Benchmark Land Value (BLV). The reduction of BLV to account for site-specific abnormal costs is only valid where that reduction maintains a sufficient incentive for the landowner to sell as required by the NPPG (ID 10-013-20190509), which states that the BLV should reflect the minimum return at which it is considered a reasonable landowner would be willing to sell their land. The NPPG confirms that the premium above the Existing Use Value (EUV) should provide a reasonable incentive for the landowner to sell. Whilst the NPPG (ID 10-014-20190509) requires the BLV to reflect the implication of abnormal costs and site-specific infrastructure costs, this reflection is not equitable to full deduction because this may result in insufficient incentive for a landowner to sell, which will stagnate land supply as landowners will not bring land forward for development. The HBF acknowledge that BLV should reflect the implications of abnormal costs in accordance with NPPG, however, there is a tipping point beyond which the land value cannot fall as the landowner will not be sufficiently incentivised to release their site for development ;</li><li>Build costs are based on latest BCIS. However, these costs do not include additional costs for 2021 Part L Building Regulations or 2025 Future Homes Standard.</li></ul> <p>Most sites should be deliverable at planning application stage without further viability assessment negotiations. Viability negotiations should occur occasionally rather than routinely. Trade-offs between policy requirements, affordable housing and infrastructure provision should not be necessary. However, if the viability of sites is overstated, policy requirements will be set at unrealistic levels. Landowners and developers will have to submit site-specific assessments to challenge assumptions in the Council's Viability Study. Such negotiations at planning application stage causes uncertainty for both the Council and developers, which may result in significant delay to housing delivery or even non-delivery.</p>	No changes required.	<p>Local Plan 2040 is supported by a whole plan viability assessment which forms part of the plan's evidence base and has informed the policies within.</p>

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LP2040 141	Michael Swinburn	SHA2	No	No	No	Yes	No	<p>LDC has failed to cooperate with Tamworth and Fazeley town council over selection of SHA2. no detail of proposed infrastructure been published. These changes should have been made clear at the time this site was chosen so that the impact was clear. SHA2 states hedges are to remain on Sutton Rd, this means road widening is out of the question. Sutton road is already overburdened. this route is important as it is the route residents use to get to A&amp;E at Good Hope Hospital. The impact to Lichfield will be zero, all the pressure will be felt by the local community and Tamworth. no mention of a secondary school. the Rawlett school is already under pressure from LDC development of Arkall Farm and Dunstall Park. A traffic survey and air pollution assessment should have been carried out before choosing a site to access suitability.</p> <p>LDC have not outlined exceptional circumstances to alter green belt boundaries. Allocation of the site will discourage the use of derelict and other urban land. George Avenue already floods at the bottomed with the existing drains unable to cope with excess water coming off the Sutton Road. There has been no consultation with TBC and very little with the local community which was not clearly publicised. The area FZ1 is the only area of green belt with public access for recreational walking we have in mile oak without travelling by car or public transport and is well used. The A453 is not suitable for the amount of traffic using it now. pollution will increase with use.</p> <p>due to the location of the development it will mainly rely on cars which goes against the NPPF. Fazeley and Tamworth will be too far to walk and cycle. the local communities petition and objections have been ignored. the deadline for objections should have been at an appropriate date to encourage more residents to respond.</p> <p>the number of homes proposed is disproportionate to other developments and will increase the population by 30%. There is no justification for taking large areas of the green belt when other areas such as Whitmore Lakes is available.</p> <p>SHA2 will not realise the councils vision for Fazeley, Mile Oak and Bonehill to be better connected to attractive green space as the development will have the opposite effect.</p> <p>The local plan 2040 and the allocation of land is not consistent with the NPPF: sections 2, section 3, section 5, section 13.</p>	No changes required.	<p>Council have worked with those authorities to whom the Duty to Cooperate applies throughout the progression of the Local Plan 2040. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. LPA has worked with infrastructure providers to support the development. Site is selected having regard to evidence base in Green Belt study and because exceptional circumstances exist to meet identified housing need</p>
LP2040 142	Christina Smee	SHA2	No	No	No	Yes	No	<p>LDC has not worked with other councils or the local community when selecting SHA2 at Mile Oak. The council have ignored hundreds of objections to SHA1 raised by the local community</p> <p>SHA2 is located in green belt. The plan does not comply with NPPF policy on protecting the green belt. the local plan is unsound as exceptional reasons required to justify 800 homes in this location in the green belt are not set out in the local plan. SHA2 does not meet the objectives in the sustainability appraisal. The results of the 2019 green belt review have not been interpreted correctly.</p> <p>brownfield sites and sites not in the green belt should be chosen before SHA2, SHA2 should not have been chosen before gathering all evidence such as traffic assessment and impact on local infrastructure. SHA2 is too big when compared to existing Fazeley ward.</p> <p>the local plan is not effective or deliverable over the plan period as the infrastructure requirements of SHA2 have not been fully considered on traffic such as the A453. High school places haven't been considered.</p> <p>allocation of SHA2 is not consistent with the NPPF: Section 5, Section 8. Section 13, Section 14, Section 15.</p>	No changes required.	<p>Council have worked with those authorities to whom the Duty to Cooperate applies throughout the progression of the Local Plan 2040. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. LPA has worked with infrastructure providers to support the development. Site is selected having regard to evidence base in Green Belt study and because exceptional circumstances exist to meet identified housing need</p>
LP2040 143	Marc Hourigan	SHA3	Unanswered	Unanswered	No	Yes	Yes	<p>Anwyl land limited objects to policy SHA3 and the allocation of land at Hay End Lane. The plan is unsound as it directs significant amount of development to lower order and less sustainable locations than Burntwood.</p> <p>Agricultural land quality is a factor when considering the allocation of sites. the clients site at Rke Hill Burntwood contains both grade 3a and 3b where as SHA3 falls under 3a. The release of land north of Hay End Lane would result in the loss of significantly more BMV agricultural land.</p> <p>Policy SHA3 is considered contrary to para 15 of the framework in that it does not provide a positive vision for the area by using land that is more important in agricultural land quality terms than reasonable alternatives. it proposes the release of significant parcel of land in a location that is less sustainable than the reasonable alternative and higher order centre of Burntwood. SHA3 does not align with the objective of sustainable development from paragraph 16 a. SHA3 is flawed contrary to para 31 of the framework. Given there is alternative land available (north of rake hill Burntwood) of lower agricultural land quality or less area of BMV policy SHA4 is also contrary to para 174 or 175 of the framework.</p>	No changes required.	<p>Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. The Spatial Strategy, including proposed allocations, supported by Council's evidence base which informs the site selection process.</p>
LP2040 144	Marc Hourigan	SHA4	Unanswered	Unanswered	No	Yes	Yes	<p>Anwyl land limited objects to policy SHA3 and the allocation of land at Hay End Lane. The plan is unsound as it directs significant amount of development to lower order and less sustainable locations than Burntwood.</p> <p>SHA4 is classed as minor whereas the clients site in Burntwood is classed as moderate. the council seeks to justify this 'moderate' classification for Anwyl land limits site as it adjoins a 'large built up area' i.e. Burntwood. the framework does not define 'large built up areas'. in our view the councils definition of large built up areas is arbitrary and unjustified. clearly any reasonable assessment of SHA4 would conclude that Whittington is a large built up area as adequately illustrated. the only safe conclusion is that Whittington is a large built up area and the green belt assessment for SHA4 should have been considered the first purpose of including land in the green belt to restrict sprawl of large built up areas as per para 138 a.</p> <p>SHA4 represents a significant outward extension westwards of the large built up area by approximately 190 metres. SHA4 only has development on one boundary and its release would mean built development would jut out awkwardly to the north west into the Green Belt where the new settlement boundary would have undeveloped land on three sites. Burntwood is a more sustainable location when comparing SHA4 to the clients north or rake hill Burntwood. Rake Hill is less important in green belt terms than SHA4 and should be considered preferable to it. Assessment of Green Belt is incorrect in terms of NPPF and green belt studies. Agricultural land quality in Green Belt has not been considered properly.</p>	No changes required.	<p>Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. The Spatial Strategy, including proposed allocations, supported by Council's evidence base which informs the site selection process.</p>
LP2040 145	Raymond Jones	SHA2	No	No	No	Yes	No	<p>Neither the local council or the community have been involved in selecting SHA2. objections to SHA2 have been ignored by the council.</p> <p>Exceptional reasons for releasing green belt have not been demonstrated. No reasonable alternatives to SHA2 have been considered. LDC has not considered impact to the local infrastructure.</p> <p>The implications on traffic have not been considered.</p> <p>The NPPF does not comply with section 2, section 5, section 8, section 12, section 14, section 12.</p>	No changes required.	<p>Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. Site is selected having regard to evidence base in Green Belt Review study and because exceptional circumstances exist to meet identified housing need. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered.</p>

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LP2040 146	Peter Sedgbeer	SHA2	no	no	no	yes	no	<p>LDC have failed to work with local councils and the local community to select SHA2. hundreds of objections have been ignored.</p> <p>The plan does not comply with NPPF on protecting green belt land, traffic survey is not complete, 2019 green belt review have been interrelated incorrectly. the allocation of SHA2 does not meet several strategic objectives set out in the sustainability appraisal. LDC have not consulted properly with the local community or considered the impact of SHA2 on the local community or Tamworth residents.</p> <p>Brownfield sites should be chosen before SHA2 and green belt sites</p> <p>the council has not considered all reasonable alternatives to SHA2, the impact on infrastructure such as high school places has not been considered.</p> <p>The local plan is not effective or deliverable over the plan period as the infrastructure requirements and implications of SHA2 have not been fully considered for example traffic on the A453.</p> <p>The local plan does not follow the nappy sections: section 2, section 5, section 8, section 13, section 14, section 15.</p>	No changes required.	<p>Council have worked with those authorities to whom the Duty to Cooperate applies throughout the progression of the Local Plan 2040.</p> <p>Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered.</p> <p>LPA has worked with infrastructure providers to support the development. Site is selected having regard to evidence base in Green Belt study and because exceptional circumstances exist to meet identified housing need</p>
LP2040 147	Philippa Kreuser	Whole document	Unanswered	Unanswered	No	Yes	Yes	<p>Support the principle of a Strategic Allocation at Fazeley, Mile Oak and Bonehill in Strategic Policy 1: The Spatial Strategy. Object to the Strategic Housing Allocation for 800 dwellings on Land West of Fazeley, Mile Oak and Bonehill in Strategic Policy 12: Housing Provision and on Inset 11. Object to the inclusion of Land West of the Sir Robert Peel Hospital, Fazeley within the Green Belt</p>	No changes required.	<p>Support noted.</p>
LP2040 148	Philippa Kreuser	SP11	Unanswered	Unanswered	No	Yes	Yes	<p>Objection is made to the omission of "Areas of Development Restraint (ADR)" in the Lichfield Local Plan 2040: Proposed Publication Document. Objection is specifically made to the deletion of the previous policy intent to allocate ADR land across the District in the Plan's strategic Green Belt policy, and the deletion of the proposed ADR sites within the plan.</p> <p>Paragraph 140 of the Framework sets out that changes to Green Belt boundaries should only occur in exceptional circumstances and where fully evidenced and justified through the updating of plans. Lichfield District Council has, as part of its evidence base to inform the Local Plan review, undertaken a comprehensive review (rather than a partial review) of the Green Belt to inform its proposed development strategy. The comprehensive Green Belt review provides the evidence for Lichfield District Council to redefine its Green Belt boundaries with a degree of permanence that the boundaries can endure beyond the plan period. As a consequence of this high level Green Belt review, the opportunity should be taken to amend the Green Belt boundaries in conformity with Paragraph 140 of the Framework. Indeed previous incarnations of the draft Local Plan suggest that Lichfield Council did have the evidence and justification to support its proposal to remove land from the Green Belt and allocate it as ADR/safeguarded land.</p>	No changes required.	<p>Safeguarded land is not considered to be required within the Local Plan 2040, particularly given Governments stated intent to introduce new planning system.</p>
LP2040 149	Joanne Jones	SHA2	Unanswered	Unanswered	Unanswered	Yes	No	<p>Object to proposed allocation SHA2 - green belt land should be protected, concerns regarding traffic and detrimental impact on local businesses</p>	No changes required.	<p>Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. Site is selected having regard to evidence base in Green Belt Review study and because exceptional circumstances exist to meet identified housing need. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered.</p>
LP2040 150	Marc Hourigan	SP1	Unanswered	Unanswered	No	Yes	Yes	<p>The Regulation 19 Local Plan's approach is considered contrary to Paragraph15 of the Framework in that it does not provide a positive vision for the area by using land that is more important in Green Belt terms and agricultural land quality terms than reasonable alternatives. The Regulation 19 Local Plan is also considered to be contrary to Paragraph 16 a) of the Framework in that it has not been prepared with the objective of contributing to the achievement of sustainable development. The submission has demonstrated that the evidence base (Green Belt Assessment and agricultural land quality considerations) underpinning the Regulation 19 Local Plan is flawed contrary to Paragraph 31 of the Framework. The Regulation 19 Local Plan will result in an unsustainable pattern of development contrary to Paragraph 142 of the Framework. The Regulation 19 Local Plan will result in unsustainable development contrary also to Paragraph 143 of the Framework. Moreover given an independent assessment that SHA2 and SHA4 should be classified as having an important role in respect of the five purposes of including land within the Green Belt these are clearly tracts of land that ought to be included within the Green Belt.</p>	No changes required.	<p>Comments noted, the proposed strategic housing allocations and wider housing delivery policies and strategies utilising a broad range of evidence bases the demonstrate sites and allocations are suitable and the most appropriate to deliver within the plan period.</p>
LP2040 151	Burntwood Town Council - Labour Group Members	Whole document	No	Unanswered	No	Unanswered	Unanswered	<p>Main concern is to reflect the views of the people of Burntwood on the issues that are currently impacting negatively on the town, as well as ensuring the plan meets future needs, delivering sustainability through appropriate growth and delivery of supportive infrastructure and facilities. Overall plan looks positive for the future of Burntwood, it appears to recognise the continuing challenges that have resulted from continuous population growth without the commensurate supporting infrastructure being put in place. Whilst it's recognised the duty to cooperate with the GBBCHMA in order to meet future housing demand, we feel strongly that this should not be at the expense of the Green Belt or the potential for future development of essential services in the town. Brownfield land should be prioritised over green belt development. The plan needs to be more proactive and robust in terms of its commitment to providing and facilitating future infrastructure development. It seems to be passive in this regard. Unless the Council leads on future development it will be driven only by developers seeking opportunities to make money rather than through the need to grow a sustainable community, which is led by the community. The Vision for the District states clearly that retail and services in Lichfield City are what matter in this plan and developing these aspects for Burntwood appear to not even be a consideration. This sums up the mind-set that has caused the lack of investment and interest in developing Burntwood into a well-resourced community over many years. An area action plan (AAP) will be prepared for Burntwood. This is to be welcomed however, it needs to be clear on the District Council being the leaders in delivering for the needs of the town and give a commitment to delivering on any plan rather than taking a passive role as has been the case so far. More emphasis needs to be placed on the provision of affordable housing for first time buyers, new families and those wishing to downsize. There is a danger of the commuter town status leading developers to produce larger properties that do not lead to a sustainable community. Point 3.23 is especially welcome in terms of the commitment to an enlarged and improved Burntwood Town Centre. However, again the language used is passive and talks of encouraging rather than driving, leading or pushing forward, which has always been the case in Lichfield where the council purchased large areas of land for development. The infrastructure options for Burntwood in terms of retail and business opportunities are not solely the preserve of the Town Centre area but the other retail areas identified in the Neighbourhood Plan are also in need of investment. Strategic Policy 1 appears to recognise this, but again a proactive approach is required to counter the decades of under investment and inertia from landowners. Growth in Burntwood as outlined in point 4.32 is to be welcomed and it is pleasing to see growth mentioned in this context as opposed to just housing growth as has historically been the case. Strategic Policy SP10 is welcomed the sustainability of our community is a primary concern. It is essential to maintaining community and personal wellbeing for residents. The points in this policy appear to address any potential concerns, which is further enhanced by Local Policy SD1. Local Policy H1 contains provision for meeting the needs of affordable housing. This is welcome but developers must not be allowed to make excuses regarding the ability to deliver affordable housing on Brownfield land. Local Policy H2 says that the council will only accept a financial contribution in lieu of on-site provision of affordable housing where it can be demonstrated on site provision is not feasible or viable. Developers are likely to seek this route where provision is viable, but it does not maximise their profits. We welcome the local policies B1 and B2 in relation to</p>	No changes required.	<p>Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. The District Council has engaged with infrastructure providers throughout plan-making process. It should be noted that infrastructure providing organisations are responsible for the delivery of infrastructure. Local Plan 2040 sets out the proposal to develop an Area Action Plan for Burntwood following the adoption of the Local Plan. The scope of any AAP will be determined during the plan-making process including through public consultation.</p>

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LP2040 152	Sylvia Coulson	Whole document	No	No	No	No	No	Object to SHA2 allocation, local area does not have the infrastructure to cope with this scale of development.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered alongside development.
LP2040 153	Paul Hill (RPS)	SP1	No	No	No	Yes	Yes	Do not consider that the level of housing delivered within the plan period is sufficient in assisting in the wider housing market area needs.	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence
LP2040 154	Paul Hill (RPS)	DTC	No	No	No	No	Yes	Do not consider that LDC has met the duty to cooperate test which must demonstrate 'active, ongoing and constructive' engagement on strategic matters relating to the LP. This is in respect of two issues; firstly, the lack of evidence to demonstrate the test has been met at the point of submission; and secondly, that the Council has not adequately addressed those strategic matters relevant to the LP strategy.	No changes required.	Lichfield District Council has worked with Duty to Cooperate partners throughout the progression of the Local Plan 2040 and engaged actively and constructively.
LP2040 155	Paul Hill (RPS)	SP11	No	No	No	Yes	Yes	Do not consider that LDC has followed correct procedure in allocating housing taking it out of green belt. LPR does not demonstrate that there a sustainable and suitable sites not in GB locations which would be more appropriate for the allocation of housing.	No changes required.	Site selection informed by evidence base in Green Belt study and because exceptional circumstances exist to meet identified housing need.
LP2040 156	Catherine Taylor	Whole Document	No	no	no	yes	no	<p>Large scale proposed development is close to the border of Tamworth and residents here will be mainly using Tamworth's facilities. LDC has not worked effectively with Tamworth BC and Fazeley Town Council in the allocation. Comments from both councils and local community have not been taken on board.</p> <p>The plan is not consistent with NPPF section 13, The green belt boundary at the natural edge of the A453 should be maintained in order to preserve the open countryside. the development will not assist in the regen of Fazeley, the council have incorrectly interpreted the results of the 2019 Green Belt review and mistakenly concluded that parcel of land at FZ1 is suitable for Green Belt release. the development will open this part of the green belt for further small scale incremental development. Infrastructure delivery has not been considered, the proposed 800 houses at Mile Oak will detract from the local character of the area which is rural edge and countryside views.</p> <p>unsound strategy as it does not consider brownfield and sites above development in the green belt which is not sustainable or suitable, not prepared positively as comments of objection have not been taken into account.</p> <p>The evidence base to justify SHA2 is not proportionate and is incomplete. Feedback has been given on traffic issues yet traffic assessments and solutions are not included. the ambitions for public transport are ideals and not realistic without funds to back it up. development is disproportionate for the size of the existing community. Incorrect interpretation of the green belt review as SHA2 makes an important contribution to the greenbelt for views and public access. The development is disproportionate for the size of the existing community.</p> <p>The plan is not effective or deliverable over the plan period as the infrastructure requirements and implications of HSA2 have not been fully considered e.g. traffic on the A353 from Sutton Coldfield to Tamworth. SHA2 is in the greenbelt which is contrary to NPPF.</p> <p>Allocation of SHA2 is not consistent with NPPF : Section 2, Section 5, Section 8, Section 13, Section 15</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.
LP2040 157	Paul Hill (RPS)	SA	No	No	No	No	Yes	RPS consider that the SA scoring in not justified and should be amended accordingly. The analysis here clearly demonstrates that there are sites more suitable in sustainability terms than currently presented in the Council's evidence.	No changes required.	Sustainability Appraisal forms part of the evidence base informing the local plan and is considered to be sound.
LP2040 158	Barry Smith	SHA2	No	No	No	yes	no	<p>the local plan does not comply with duty to cooperate, the council have not worked with TBC and Fazeley Town Council or local community to select SHA2. The council have ignored hundreds of objections to SHA2</p> <p>The plan does not comply with the NPPF on protecting Green Belt, no evidence of traffic assessments and results of 2019 green belt review interpreted incorrectly. allocation of SHA2 does not meet several strategic objectives and priorities set out in sustainable appraisal, the council has not considered impact on Tamworth residents.</p> <p>Brownfield before Green Belt , impact on local infrastructure and school places not considered.</p> <p>SHA2 does not comply with NPPF: Section 2, Section 5, Section 8, Section 8, Section 13, Section 14, Section 15</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.
LP2040 159	Paul Hill (RPS)	SP12	No	No	No	yes	Yes	Consider strategic allocations are not the most appropriate from site selection methodology. Question the deliverability assumptions (but not the principle of development) applied to the SHA1 site. The quantum of growth is inadequate to address the housing needs of all household groups (notably those in need of affordable housing) nor makes sufficient contribution to the needs of wider HMA. To reiterate, the proposed housing requirement in the LDLP is not soundly-based (not justified or consistent with national policy).	No changes required.	Comments noted, the proposed strategic housing allocations and wider housing delivery policies and strategies utilising a broad range of evidence bases the demonstrate sites and allocations are suitable and the most appropriate to deliver within the plan period.
LP2040 160	Sandra Lees	SHA2	N/A	N/A	N/A	N/A	N/A	object to houses proposed in Mile Oak, Tamworth is overwhelmed already by development and the existing infrastructure is unable to cope. Further development will only compound matters. Will doctors, dentist and hospital appointment facilities be available in Lichfield for the proposed development? Tamworth has fewer facilities than Lichfield in regard to the hospital and police. perhaps a spare field near to Lichfield should be used as an alternative site for development.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.



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LP2040 161	Anna Miller	Whole document	No	yes	no	yes	yes	<p>The memorandum of understanding and statement of common ground in which it is agreed that Lichfield will seek to provide a proportion of Tamworth's unmet housing and employment needs updating. Further work is required to ensure appropriate mitigation measures are in place for the existing permitted developments on the boarder before any further development on the border is considered.</p> <p>The proposed plan provides a strategy to meet the needs of LDC and takes into account needs of neighbouring areas in terms of providing a contribution towards the unmet housing need of Tamworth and the wider housing market area. TBC does have some concerns over the sustainability of the proposed development on the border with Tamworth which are set out elsewhere in this response.</p> <p>The highways evidence to support the proposed allocations is not currently available, this is of particular importance for the sites adjacent to the Tamworth border where highways capacity is already a concern. TBC accepts that the reasons for the delay are beyond the control of LDC and due to the global pandemic. however until such time as the highway evidence is available the council cannot agree that the proposals are based on proportionate evidence and therefore justified.</p> <p>TBC considers that more work is needed to ensure that cross-boundary issues are dealt with at the plan making stage and are not deferred until a planning application is submitted. TBC considers that the issues should be addressed in the plan rather than deferred until later to ensure an Arkall Farm experience is not repeated.</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. Site is selected having regard to evidence base in Green Belt Review study and because exceptional circumstances exist to meet identified housing need. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered.
LP2040 162	Megan Reilly	SHA2	no	no	no	no	no	<p>LDC have not worked with TBC or Fazeley Town Council to select SHA2. LDC have ignored hundreds of objections to SHA2 raised by the local community.</p> <p>The plan does not comply with NPPF on protecting Green Belt land. Allocation of ShA2 does not meet several strategic objectives and priorities set out in sustainability appraisal. the consultation methods have been poor and they have not adhered to statement of community involvement.</p> <p>brownfield sites should be chosen before SHA2, council have not considered all reasonable alternatives to green belt release. SHA2 should not have been selected before gathering evidence from traffic assessments, impact on local infrastructure, high school places.</p> <p>local plan is not effective or deliverable over the plan period as the infrastructure requirements and impacions of SHA2 not full considered with immense traffic on A354 between Sutton Coldfield and Tamworth.</p> <p>Local plan goes against NPPF sections: Section 2, Section 5, Section 8, Section 13, Section 14, Section 15.</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. Site is selected having regard to evidence base in Green Belt Review study and because exceptional circumstances exist to meet identified housing need. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered.
LP2040 163	Rosalind Payne	SHA2	no	no	no	no	no	<p>Local council not consulted or local community</p> <p>LP does not comply with planning policy on protecting Green Belt land. The surrounding would not be able to absorb such a large community that is proposed.</p> <p>Tamworth and Fazeley residents unable to absorb houses, Lichfield not prepared to include these houses into a brownfield site near the centre of Lichfield. Congestion at Ventura unbearable.</p>	No changes required.	Consultation events have taken place within Fazeley multiple times during the Local Plan Review Process. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. Site is selected having regard to evidence base in Green Belt Review study and because exceptional circumstances exist to meet identified housing need. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered.
LP2040 164	John Teale	SHA2	no	no	no	N/A	no	Save Mile Oak Green Belt	No changes required.	Comment noted. Site is selected having regard to evidence base in Green Belt study and because exceptional circumstances exist to meet identified housing need
LP2040 165	Terrence Henn	SHA2	no	no	no	no	no	<p>Plan is inconsistent with the NPPF section 13, missing evidence such as a traffic assessment, 2019 green belt review has not been interpreted correctly, allocation of SHA2 does not meet strategic objectives and priorities set out in sustainability appraisal, council has not consulted properly with local community on SHA2. Brownfield before green belt. reasonable alternatives to SHA2 have not been considered. Traffic on A453 has not been considered and the impact development will have.</p> <p>NPPF is not consistent with the following sections: Section 2, Section 5. Section 8, Section 13, Section 14, Section 15.</p>	No changes required.	Consultation events have taken place within Fazeley multiple times during the Local Plan Review Process. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. Site is selected having regard to evidence base in Green Belt Review study and because exceptional circumstances exist to meet identified housing need. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered.
LP2040 166	Kezia Taylerson	SP1	N/A	N/A	N/A	N/A	N/A	<p>Unclear as to how particular heritage assets have been chosen and how they will be afforded greater protection than other designated assets.</p> <p>we consider that it would be appropriate for the plan to consider Green Belt release now for Burntwood to consider Green Belt release now to ensure that there are no reasonable alternatives to the four strategic allocations being proposed through the plan. Will the AAP consider site allocations?</p>	No changes required.	Local Plan 2040 contains detailed policy in respect of heritage assets.
LP2040 167	Kezia Taylerson	INF1	N/A	N/A	N/A	N/A	N/A	Local Policy INF1: Supporting and Providing Infrastructure – we consider that it would be appropriate to add heritage to the infrastructure list so that appropriate projects can be funded in this way. We have seen this in other local authority areas and specific heritage and public realm projects are being considered. This sets out a positive strategy for the historic environment and can be key in addressing issues such as heritage at risk.	No changes required.	Local Plan 2040 contains detailed policy in respect of heritage assets.
LP2040 168	Kezia Taylerson	SP8	N/A	N/A	N/A	N/A	N/A	Supportive to safeguarding of the route of the Lichfield Canal and Heritage Towpath Trail, supportive of para 6.55 and 6.5	No changes required.	Support noted.
LP2040 169	Kezia Taylerson	SD1	N/A	N/A	N/A	N/A	N/A	Concerns about the language used within this policy relating to the historic environment, whereby applications and masterplans will need to 'have appropriate regard to the historic environment'. It is considered that this form of wording will not meet the intended aims of conserving and enhancing the historic environment, heritage assets including their setting. It is requested that this wording is deleted and replaced with 'and conserving the significance of the historic environment, heritage assets, including their setting, or similar. We consider that the policy is unsound in its current wording.	No changes required.	Local Plan 2040 contains detailed policy in respect of heritage assets.

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LP2040 170	Kezia Taylerson	SP10	N/A	N/A	N/A	N/A	N/A	Strategic Policy 10: Sustainable Development we consider should include a separate clause for the natural environment and a separate clause for the historic environment, as by joining them together, the sentence is unclear as to what is required for each. To 'conserve, enhance or expand ...' is not an appropriate requirement for the historic environment and we request amendments in order to ensure that the policy is sound and effective.	No changes required.	Local Plan 2040 contains detailed policy in respect of heritage assets.
LP2040 171	Kezia Taylerson	SD2	N/A	N/A	N/A	N/A	N/A	We welcome the clause referencing the historic environment and the need for schemes to ensure any adverse impacts are acceptable. However, we consider the wording to be misleading as it will be difficult to judge what 'adverse impacts begin made acceptable' will amount to and we require an amendment to the policy text. we would also welcome reference in the policy or reasoned justification text to the opportunities heritage assets can bring for sustainable development and climate change mitigation.  para 8.3 and para 8.6 raise some specific concerns for historic England with regards to the buffer of housing being proposed in the plan. it is considered that such a large buffer for housing delivery is causing harm to heritage assets and their setting, as outlined through our specific comments on the proposed strategic allocations.	No changes required.	Local Plan 2040 contains detailed policy in respect of heritage assets. Local Plan 2040 includes a 'buffer' in respect of housing provision, this is to ensure the plan is flexible across the plan period.
LP2040 172	Kezia Taylerson	H3	N/A	N/A	N/A	N/A	N/A	Accommodation for Gypsies and Travellers will need to ensure that any development considers its impact on the historic environment and complies with the NPPF. There is currently no consideration within this section.	No changes required.	Local Plan 2040 contains detailed policy in respect of heritage assets. The development plan should be read as a whole.
LP2040 173	Kezia Taylerson	E2	N/A	N/A	N/A	N/A	N/A	E2 would benefit from inclusion in recognising the role of heritage in the tourism sector, the historic environment is a positive opportunity for tourism both financially culturally and we are keen for this to be recognised. If a clause was added referring to the historic environment, then paragraph 9.23 could also be updated.	No changes required.	Comments noted. Policy E2 and explanatory text note the importance of heritage to the District's tourist economy.
LP2040 174	Kezia Taylerson	SP16	N/A	N/A	N/A	N/A	N/A	A reference to heritage within this policy is supported. It is particularly important to consider the cumulative impact on a historic landscape and how new developments within its setting affect both the landscape itself as well as the relationship between assets and features within the landscape. we would welcome a reference here to include these issues and that assessment should consider the cumulative impacts for historic landscapes and the assets and features sited within them.  Cannock Chase Area of Outstanding Natural Beauty is a historic landscape with designated and non designated heritage assets within its boundary and HI is keen to ensure that these conserved and enhanced, and that the relationship between assets and features within this designated landscape are understood, considered and protected.	No changes required.	Support noted.
LP2040 175	Kezia Taylerson	SP17	N/A	N/A	N/A	N/A	N/A	Para 11.5 Historic England supports the reference to conservation area appraisals and management plans and are keen to see these available in a timely manner to be relevant to current and future planning applications.  Keen to understand how the plan has a positive strategy for heritage at risk?  Concern with the final sentence in the final bullet point of this section and consider the sentence to be unsound. Additional appropriate assessments will be undertaken where there is a need to understand the impact to the significance of heritage assets, and their setting or to gain a better understanding of unknown archaeological deposits or to evidence appropriate avoidance and mitigation measures etc. It is disagreed with 'subject to sensitivity and importance of the site and its surroundings in view of the local authority' is an appropriate form of wording as it is not clear to a prospective developer when an additional assessment may be required and it is vague in its intention and application which may lead to a lack of assessments being undertaken.  Does the council have any evidence based on what views and vistas will need to be protected and information on views analysis to inform the determination of planning applications or will the council require planning applications to include views assessment at the time of submitting planning applications? The plan needs to address this for the policy to be sound.	No changes required.	Local Plan 2040 contains detailed policy in respect of heritage assets. The development plan should be read as a whole.
LP2040 176	Kezia Taylerson	SHA1	N/A	N/A	N/A	N/A	N/A	Historic England considers this proposed allocation within the Local Plan as unsound in its current context and a HIA is welcomed to accompany the proposed allocation however we note that the HIA raises several concerns with regards to the impact to the historic environment, heritage assets and their setting and recommends a number of mitigation measures and that the HIA states that mitigation measures are not sufficient to remove the harm altogether.  concerns on Scheduled Monuments included within the proposed allocation site boundary. object to any development on the SM or its setting, contrary to S16 of NPPF.  Historic England is keen to engage with LDC on details regarding SHA1 and further details required. More information on mitigation measures are required.  HS2 has significantly impacted this area, so further care needs to be taken. HS2 historic analysis could also be used as an evidence base to provide further understanding for heritage assets within this area.  the current policy text relating to the historic environment us unsound and not compliant with the NPPF. the policy does not reflect section 16 of the NPPF and fails to recognise heritage assets as an 'irreplaceable resource'. we consider the wording should be amended to reflect NPPF. in addition to the creation of a new policy text setting out specific mitigation measures required to be included within the plan.  a reduction in the number of dwellings proposed and insertion of appropriate mitigation measures may assist in alleviating the harm to heritage.	No changes required.	Local Plan 2040 contains detailed policy in respect of heritage assets. The development plan should be read as a whole. Some of the concerns raised within the objection are matters of detail which would be assessed at a planning application stage to which Historic England are a statutory consultee.
LP2040 177	Kezia Taylerson	SHA2	N/A	N/A	N/A	N/A	N/A	Historic England does not object to the proposed strategic allocation at Fazeley. However it is noted that the HIA does stipulate several recommendations to be considered for the future masterplan and any forthcoming planning application. We are keen to ensure that mitigation measures identified within the recommendation section of each of the HIA's is incorporated into site specific policy text for each site to ensure that the allocations are sound and that a material consideration when preparing the masterplan and determining a future planning app. HI is willing to discuss how these could be addressed in a policy to mitigate harm to heritage.  HI is keen to understand how the development can address the risk at the conservation area  we consider the current clause to 'preserve and enhance the historic environment and out understanding of or' is not sufficient or effective and we requirement amendments to the policy to conform to the NPPF.	No changes required.	Local Plan 2040 contains detailed policy in respect of heritage assets. The development plan should be read as a whole. Some of the concerns raised within the objection are matters of detail which would be assessed at a planning application stage to which Historic England are a statutory consultee.

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LP2040 178	Kezia Taylerson	SHA3	N/A	N/A	N/A	N/A	N/A	<p>Historic England considers that this proposed allocation is unsound in its current context. We welcome the preparation of a HIA of this site and seek the mitigation measures identified in the HIA to be included in a site specific policy in the plan. HI welcomes discussions for mitigation measures.</p> <p>Historic England is concerned about the harm to the significance of the scheduled monuments, including the ability to experience and appreciate the asset in its rural, archaeological setting.</p> <p>HI are concerned about the proposed allocation boundary abutting the SM as this does not protect the significance of the SM, its setting or the wider archaeological setting and features in the landscape. HI are also keen for further assessment to understand the relationship of the identified crop markings and the SM and the wider archaeological setting. HI would seek this buffer to be highlighted on the allocations plan to avoid future confusion and discussion about where development may be sited during the masterplan.</p> <p>further archaeological assessments are required to be undertaken to understand the potential for archaeological deposits, mitigation measures to protect the canal conservation area, opportunity to reintroduce historic pathways into the site and also link with the canal.</p>	No changes required.	Local Plan 2040 contains detailed policy in respect of heritage assets. Heritage Impact evidence supports the Local Plan 2040. Concerns raised within the objection are matters of detail which would be assessed at a planning application stage to which Historic England are a statutory consultee.
LP2040 179	Kezia Taylerson	SHA4	N/A	N/A	N/A	N/A	N/A	<p>A few heritage assets maybe affected through development HI requires these mitigation measures to be included within a site specific policy to ensure that they are fully considering during the Master planning and planning app stage.</p> <p>It is considered also that the policy text is unsound and it is requested that it be updated to reflect NPPF.</p>	No changes required.	Local Plan 2040 contains detailed policy in respect of heritage assets. The development plan should be read as a whole.
LP2040 180		SHA2	N/A	N/A	N/A	N/A	N/A	<p>The HIA of Strategic Policy SHA4 Land off Huddlesford Lane strategic housing allocation highlights a few heritage assets that may be affected through its development and sets out several mitigation measures to over come this harm. We require these mitigation measures to be included within a site specific policy to ensure that they are fully considered during the master planning and planning application stage. Additionally, as raised elsewhere we consider the policy text 'preserve or enhance the historic environment and improve our understanding of it' to be unsound and request an amendment to read, 'conserve and enhance the significance of the historic environment, heritage assets including their setting' or similar. Approach to other villages and settlements. Please see Historic England's comments to the Preferred Options consultation in January 2020. We note that there are a number of references within the vision of the different areas and we are pleased to note references to the historic environment. We are keen to ensure that wherever the historic environment is referenced that there is a positive strategy for the conservation and enjoyment of the historic environment, in line with the NPPF and that the wording chosen is compliant with the NPPF.</p> <p>Potential new settlement -aware that a further new settlement was considered for allocation during this local plan process but that this has been set back for consideration outside of the plan period. Historic England are keen to ensure that there is early engagement with regards to a potential new settlement and remain concerned about the quantum of development and the cumulative impacts of large scale development within specific areas, such as North Lichfield.</p>	No changes required.	Local Plan 2040 contains detailed policy in respect of heritage assets. Heritage Impact evidence supports the Local Plan 2040. Concerns raised within the objection are matters of detail which would be assessed at a planning application stage to which Historic England are a statutory consultee.
LP2040 181	Sushil Birdi (Cannock Chase DC)	SP12	Yes	Yes	Yes	Yes	Yes	Support the approach of Lichfield District Council in acknowledging the Strategic Growth Study prepared on behalf of the HMA authorities within the housing market area and the continuing monitoring of the position in respect of housing needs within the market area and published position statement. Also supports LDC in seeking to help address the wider GBBCHMA housing shortfall. The inclusion of a buffer to provide flexibility in the housing supply across the plan period at paragraph 8.6 of Strategic Policy 12 (SP12): Housing provision is supported.	No changes required.	Support noted.
LP2040 182	Sushil Birdi (Cannock Chase DC)	FR3	Yes	Yes	Yes	N/A	Yes	CCDC welcome continuing discussions under the Duty to Cooperate in this regard. Policy FR3: Fradley economy which supports provision of a lorry park within or close to Fradley is supported.	No changes required.	Support noted.
LP2040 183	Natalie Atkinson (Tetlow King Planning)	Whole document	Yes	Yes	Unanswered	Yes	No	West Midlands Housing Association Planning Consortium (HAPC) supports the vision for the largest settlements to make the most of the housing need for the area. However, urge the Council to consider other areas a for development - restricting growth solely to city centre urban land will not enable the Council to meet its housing target or deliver sufficient affordable homes. HAPC supports the housing requirement which is expressed as a minimum. It is appropriate that the Council has agreed to assist within unmet needs arising from the HMA. Support the inclusion of Policy H1 as it sets out how new residential development will provide affordable homes. The table within the policy is prescriptive but flexible. HAPC support having a flexible guideline on what will be permitted by the Council. Support Policy H2. HAPC are supportive of onsite affordable housing provision, however do not believe this should be at the detriment of overall affordable housing delivery. If viability does not allow for onsite provision then HAPC would prefer to see developers making contribution rather than applications being refused.	No changes required.	Support noted. Housing requirement within the Local Plan 2040 provides for the Local Housing Need (LHN) as established by the Standard Methodology and supported by evidence within the HEDNA.
LP2040 184	Sushil Birdi (Cannock Chase DC)	SP14	Yes	Yes	Yes	N/A	Yes	CCDC welcomes the reference to having regard to neighbouring centres Strategic Policy 14 (SP14): Centres and supports the expansion of Burntwood to meet local needs only, para's 3.7, 3.23, 4.6, As identified in previous discussions under the Duty to Cooperate and our response to the Lichfield Local Plan Review consultations.	No changes required.	Support noted.
LP2040 185	Sushil Birdi (Cannock Chase DC)	SP13	Yes	Yes	Yes	N/A	Yes	In relation to Natural resources. We would suggest that reference be made to improving the green corridor between Cannock Chase and Sutton Park referred to in the Vision and LA1: Little Aston services and facilities and vision and Policy ST2 should be included within Strategic Policy (SP15) given its strategic nature. Reference should also be included in regard to the potential of development to impact upon the Cannock Extension Canal SAC. Policy NR5: Cannock Chase Special Area of Conservation and the approach to Cannock Chase SAC policies are supported.	No changes required.	Comment noted. No such land designation requiring noting in policy is present.
LP2040 186	Brian Hoult Fazeley Town Council	SHA2	N/A	N/A	N/A	N/A	N/A	<p>SHA2 was not arrived at by consultation and cooperation of this town council or local community. There has been no acknowledgement of the many objections made by local residents in the previous consultation. There has been no modification/reduction to the excessive number of houses in SHA2 after numerous objections.</p> <p>SHA2 site is on green belt land contrary to national policy for protecting Green Belt. We do not believe the impact of 800 houses on the already congested local road network has not been fully assessed.</p> <p>Brownfield site development should be prioritised over greenfield. A huge development of 800 houses is disproportionate. Dunstall Lane development is in close proximity so this large development will impact the already congested road network and local infrastructure.</p> <p>SAH2 cannot be effective in meeting the areas housing needs if its effect on road network and infrastructure has not been properly considered and its negative effect not correctly realised. SHA2 is not effective if it contravenes NPPF by use of Green Belt when other sites in the district are available.</p> <p>SHA2 being disproportionately large in comparison with the current housing distribution will not enhance nor help sustain our historic environment. the local countryside will be destructed.</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.

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LP2040 187	Hayley Regan Parker	SHA2	N/A	N/A	N/A	N/A	N/A	There is always congestion on these roads as it is, due to the theme park , new builds and road works. Attached Fazeley Town Council letter.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.
LP2040 188	Harworth Group Plc (Ms Claire Biddle)	4.34	Yes	Yes	No	Yes	Yes	Object to para 4.34 as currently drafted. Whilst is recognised that the settlement of Burntwood is bounded by Green Belt Land it is considered that the preparation of the local plan provides the opportunity to alter green belt boundaries and Lichfield have taken this opportunity to amend the green belt at the larger service villages of Fazeley, Mile Oak, Bonehill, Fradley and Whittington to accommodate strategic housing allocations. It is considered that release from Burntwood would be appropriate given the hierarchy and size of the settlement and the fact that is identified in a higher category within the settlement hierarchy than these larger service villages. A proactive approach to housing delivery should be adopted by the council to ensure sufficient sites are located in Burntwood. The council would therefore be justified in increasing housing above the proposed level at Burntwood. The site at Hospital Road, Burntwood exists with few constraints apart from being washed over as Green Belt and offers a sustainable location to develop housing including affordable and housing for older people, adjacent to high performing settlement.  It is considered that the low level of housing and no new strategic allocations to be provided at Burntwood has not been adequately justified. The settlement in sustainability terms is high scoring and specialist housing for older people is required to be located here.  The Plan as currently drafted does not accord with NPPF it does not locate housing to the most sustainable settlements and does not provide an adequate mix of housing types and tenures to ensure a balanced mix of communities.	No changes required.	Spatial strategy is considered appropriate and based upon a range of evidence and constraints. This includes, but is not limited to, consideration of environmental constraints, Green Belt review.
LP2040 189	National Grid, Chris Johnson	Whole Document	N/A	N/A	N/A	N/A	N/A	The information has been reviewed and the National Grid has no comments to make in response to the consultation. If NG can be of any assistance in providing informal comments in confidence during policy development NG are willing to be contacted. To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NG wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. consult NG on any development plan document or site specific proposals that could affect National Grids assets.	No changes required.	Comments noted.
LP2040 190	Gary Palmer Solihull MBC	Whole Document	n/a	N/A	N/A	N/A	N/A	Solihull MBC welcomes the continued and on going engagement Lichfield DC has with the other HMA authorities, including SMBC.  SMBS welcomes the contribution Lichfield is making towards the unmet needs of the HMS, however it is not clear (and therefore may not be properly justified and sound) as to how the following matters have been addressed with/dealt with:  - Scope for LDC to make a greater contribution to the shortfall, especially bearing in mind the contribution that non-green belt land can make. - SMC is disappointed that the contribution towards HMA unmet need has reduced from 4,500 to 2,665. a reduction of 40% needs to be properly justified. - lack of justification/evidence for HMA contribution to be only be provided from 2027 onwards given (a) there is still a role for Lichfield plan to make sure the shortfall in 2017 Birmingham plan (2011-31) is fully dealt with and (b) recent completions have been at a significantly higher rate than Lichfield LHN. -lack of justification/evidence for 2,000 dwellings from HMA contribution to be apportioned to the Black Country. - the Lichfield plan includes a significant buffer between identified needs and identified supply. A smaller buffer can be provided that still results in providing flexibility that Lichfield are seeking and that the needs figure 9,727 can be raised to make it clear that a greater contribution towards HMA is achievable.  These representations are considered to be matters of soundness, rather than a deficiency in the legal duty to cooperate test.  SMBC pleased to continue to liaise with LDC over these matters and reserves the right to attend and appear before any subsequent examination hearings.	No changes required.	Housing requirement within the Local Plan 2040 provides for the Local Housing Need (LHN) as established by the Standard Methodology and supported by evidence within the HEDNA.  Local Plan 2040 proposes to provide 2665 dwellings to meet unmet needs from the GBBCHMA with 2000 towards the shortfall arising from the Black Country. This is in addition to unmet need provided in the adopted local plan. The 2020 Position Statement identifies that the unmet need arising from the Black Country will emerging from 2027/28. Local Plan 2040 proposes four strategic allocations and includes a significant number of smaller 'saved' allocations from the current local plan which will continue to deliver significant homes to meet the housing requirement to 2040. In respect of the 35% uplift to Local Housing Need of cities this applies only to those authorities and guidance states this should not be met outside of the city authorities.
LP2040 191	National Forest Company, David Kelly	NR8	Yes	Yes	No	Yes	No	The National Forest Company consider that the drafting of the NR8 policy is unclear and suggests amendments. The previous drafting referred to an appendix to the Biodiversity SPD which was to take into account how to meet net gain requirements while still having a focus on trees within the National Forest. That appendix was never drafted. The amended wording is unclear in what needs to be accorded with. Suggest the policy be amended to refer specifically to guidance prepared by the National Forest Company.	No changes required.	Policy as drafted does not refer to supplementary planning documents. Explanatory text to the policy refers to the National Forest Company's guide to planners, this is considered to be sufficient.
LP2040 192	Jennifer Jones	SHA2	N/A	N/A	N/A	N/A	N/A	Traffic in Mile Oak is already very congested particularly turning towards Fazeley from the Sutton Road. Accidents have occurred here and building more houses will not help the situation. Fazeley is at a standstill in summer months due to Drayton Manor Theme Park. Ventura Park is another area of concern.  Where will wildlife go when you use all the green belt land to build houses.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.



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LP2040 193	Brian Symonds	SHA2	No	No	No	Yes	No	LDC have not worked with the local community or local councils to select SHA2, LDC have ignored hundreds of objections to SHA2  The plan doesn't comply with national planning policy regarding green belt. The local plan is unsound as exceptional reasons to justify 800 homes in this location in the greenbelt are not set out in the local plan.  Brownfield sites and sites not in the greenbelt should be chosen ahead of SHA2. Objections to SHA2 made during the preferred options consultation have been ignored.  There are non green belt alternatives to SHA2. Traffic assessment is missing, local infrastructure requirements, impact of new development in Tamworth, high school places have not been considered.  The plan doesn't comply with the NPPF: Section 2, Section 5, Section 8, Section 13, Section 14, Section 15.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.
LP2040 194	Mark McFadden (CBRE) on behalf of St Modwen	Strategic Objective 7	No	No	No	Yes	Yes	Policy does not have regard to unmet employment needs from wider Functional Economic Market Area (FEMA). Supporting evidence does not consider how the Council may meet any unmet needs from the FEMA.	No changes required.	Local Plan 2040 identifies sufficient land to provide for the District's employment land requirements. Local Plan 2040 and supporting evidence note there is limited deliverable employment land within Lichfield District with only sufficient land to meet the District's needs. Note that the site promoted is allocated for employment uses within the adopted Local Plan.
LP2040 195	Mark McFadden (CBRE) on behalf of St Modwen	Strategic Objective 8	No	No	No	No	Yes	Strategic Objective 8 relates to employment opportunities. St Modwen welcomes the new reference regarding planning decisions, which should encourage employment opportunities within the district wherever this is sustainable and in accordance with the plan as a whole, and the new reference to encouraging the development of new enterprise, as well as existing enterprise.	No changes required.	Support noted.
LP2040 196	Mark McFadden (CBRE) on behalf of St Modwen	Strategic Policy 1	No	No	No	Yes	Yes	SP1 should recognise the need to provide a diverse and commercially attractive portfolio of both new and existing employment sites, in order to provide sufficient quantities of employment land which is responsive to market requirements for a range of sectors. At present, Policy SP1 suggests that employment needs will be met solely through the retention and redevelopment of older employment sites. This does not support the delivery of new employment sites, which will be required over the Plan period to accommodate inward investment.	No changes required.	Local Plan 2040 identifies sufficient land to provide for the District's employment land requirements. Employment land supply is considered to be flexible and meet the employment land needs of the District supported by the Council's Housing and Economic Development Needs Assessment (HEDNA).
LP2040 197	Des Dunlop (D2 Planning) for Bromford Housing Association	Strategic Policy 1	No	No	No	Yes	Yes	Support is given in principle to the statement that the overall housing is expressed as a 'minimum'. The housing provision should not be viewed as a ceiling and would be viewed as contrary to guidance in the NPPF.  Reference is made to the provision of 7,062 dwellings to meet the local housing need in Lichfield District, does not believe that this level of housing provision will actually meet the future open market and affordable needs of the District.  The Annual Monitoring Report (AMR) 2020 provides annual affordable housing completions within the District since the adoption of the Local Plan in 2015. In no year since the start of the period have affordable housing completions ever met or exceeded the annual affordable need set out in the SHMA. In addition, affordable housing completions have never met the need identified in the more recent HEDNA that has informed this emerging Local Plan. There has been a significant under provision of affordable housing within the District over the last 5 years, there is therefore an urgent need for the provision of affordable housing to meet these identified housing needs.  Affordable housing completions have, on average, formed only a 15% element of overall supply since the start of the plan period in 2008. The Spatial Strategy suggests that the majority of new housing will be directed to a number of locations inter alia which includes 'Burntwood Town Centre'. However, this policy's directive to support new housing in Burntwood Town Centre is not carried forward in Policy 14 Centres and Policy B2 Burntwood Services and Facilities. This needs to be corrected.  The land known as the Blue Hoarded Site should not continue to be reallocated for housing in line with the detailed planning application submitted by Bromford Housing Association and London & Cambridge Properties Ltd that is currently being considered by the Council (App no: 21/00914/FULM). The site should be allocated for residential use. It is important that allocations for Town Centre uses are not retained when they have already failed over a considerable period of time. This is contrary to paragraphs 122 and 123 of the NPPF. Sufficient land still exists at the Olaf Johnson site which can accommodate future Town Centre expansion.  It is unclear why Burntwood as the second largest settlement in the District is only accommodation 4% of the housing provision when Rugeley a smaller settlement is accommodating a larger proportion (6%) looking at the settlement hierarchy in Table 4. Burntwood has a number of brownfield opportunities which are eminently suitable for residential development. The development of these sites will ensure the integrity of the Green Belt remains and there would be no detrimental impact on the Special Area of Conservation.	No changes required.	Local Plan 2040 seeks to plan for the Councils established local Plan 2040 includes policies which seek to deliver increased levels of affordable housing and ensure that development remains viable.
LP2040 198	Des Dunlop (D2 Planning) for Bromford Housing Association	Strategic Policy 2	No	No	No	Yes	Yes	Support is given to this policy in principle which seeks amongst others to ensure that all new development is well served by an alternative choice of transport modes. If this policy is to be effective, it is imperative that development sites are identified in locations that can take advantage of existing facilities which can be accessed by a range of non car modes.  The Local Plan Review recognises that Burntwood is one such location. In this instance there are a number of brownfield sites in Burntwood that are eminently suitable for residential development e.g. Blue Hoarded Site. These sites are close to existing facilities and can be accessed by walking, cycling and public transport. Many are in locations where use of the private car can be minimised.	No changes required.	Support noted.
LP2040 199	Des Dunlop (D2 Planning) for Bromford Housing Association	Strategic Policy 3	No	No	No	Yes	Yes	Support is given in principle to this policy. However, it will only be achieved if the emerging Local Plan ensures that new development is located in sustainable locations where advantage can be taken of existing (or improved) non car mode travel. Sites in Burntwood (Blue Hoarded Site) in particular are well located to facilitate access by non car modes.	No changes required.	Support noted. Site promoted for development is within the identified town centre boundary. Noted that planning application for development of site refused.

Representation Ref (LP2040 X).	Consultee/Agent	Section	Duty to Cooperate	Legally and procedurally Compliant?	Is the plan sound? (inclusive of positively prepared, justified, effective and compliance with NPPF)	Does the respondent suggest changes	Does the respondent wish to appear at EiP	Comment Summary	Changes Required	Officer Response
LP2040 200	Des Dunlop (D2 Planning) for Bromford Housing Association	Local Policy LT1: Parking Provision	No	No	No	Yes	Yes	In setting parking standards for new development, the guidance in paragraph 107 of the NPPF states that account should be taken of: - "a) the accessibility of the development; b) the type, mix and use of development; c) the availability of and opportunities for public transport; d) local car ownership levels; and e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles. a) the accessibility of the development; b) the type, mix and use of development; c) the availability of and opportunities for public transport; d) local car ownership levels; and e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles." Furthermore, the guidance in paragraph 108 of the NPPF should also be taken into account, namely that minimum parking standards should only be set when there is clear and compelling justification.	No changes required.	Comments noted. Local Plan 2040 does not set out parking standards. Parking Standards are contained within supplementary planning documents.
LP2040 201	Des Dunlop (D2 Planning) for Bromford Housing Association	Strategic Policy SP5	No	No	No	Yes	Yes	Support is given in principle to the policy which requires new development to provide new infrastructure as a result of the development. However suggests policy recognises the requisite test in the CIL guidance i.e. paragraph 122 of the CIL guidance (as amended). Policy should also be amended to reflect the viability of schemes which can hinder the delivery of sites.	No changes required.	Supported noted.
LP2040 202	Des Dunlop (D2 Planning) for Bromford Housing Association	Strategic Policy SP10	No	No	No	Yes	No	Support is given to the policy in principle particularly criterion 4 which states that: 'Encourage the re-use of previously developed land and the re-use of buildings as a sustainable option, especially the positive contribution that conservation of heritage assets and their settings can make'.  It is imperative that the Local plan carries through this objective and identifies suitable brownfield sites for housing in sustainable locations. Such opportunities exist in Burntwood e.g. the Blue Hoarded site. The Local Plan should carefully consider all brownfield site opportunities for housing in Burntwood and be proactive in bringing them forward for residential development.	No changes required.	Supported noted.
LP2040 203	Des Dunlop (D2 Planning) for Bromford Housing Association	Local Policy SD2: Renewable and Low Carbon energy	No	No	No	Yes	Yes	Support is given to this policy in principle. However, no where does the policy mention the practicalities of providing renewable energy on major development proposals. This is a fundamental issue and the practical problems of providing renewable energy should be factored into the policy.	No changes required.	Supported noted.
LP2040 204	Des Dunlop (D2 Planning) for Bromford Housing Association	Strategic Policy 12	No	No	No	Yes	Yes	The overall housing provision will be calculated using the Government's standard methodology but given that it may change as it is under review, the initial housing provision for Lichfield District will not be known until the Plan is submitted for Examination. It is apparent that Lichfield has not met its affordable housing need since the Local Plan was adopted. Does not believe that if the housing provision is around 9,727 new houses that this will meet affordable housing needs in the future. Accordingly, the housing provision needs to be significantly increased if the Local Plan is serious about meeting its affordable housing targets.  Objections are lodged to the non allocation of land known as the Blue Hoarded Site, Milestone Way, Burntwood for residential use. Representations should be read in conjunction with representations in respect of Policies SP14 Centres and B2 Burntwood Services & Facilities. The land known as the Blue Hoarded site should not continue to be identified within the Town Centre and should be reallocated for residential development. A planning application for the redevelopment of the site for residential development (100% affordable housing) has recently been submitted.  There are also a range of economic, social and environmental benefits which will be provided as part of the proposals: Providing new housing in accessible locations would assist the local economy through construction jobs and jobs in the supply chain as well as retail sales for new domestic products such as carpets and white goods. The proposals would provide local employment opportunities which will create investment and jobs. There are also financial benefits such as the New Homes Bonus and direct construction jobs. Social benefits include meeting an identified affordable housing need and the proposals would help to maintain and enhance the economic viability of shops and services in Burntwood. Environmental benefits include using previously developed land and lies within the urban area of Burntwood. The development has no objections based on flooding, drainage, noise, air quality or cultural heritage.  The allocation of the Blue Hoarded site at Burntwood complies with the three strands of sustainability as outlined in the NPPF.	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Contribution was decreased following the publication of the latest GBBCHMA position statement (published 2020) which indicated that BC shortfall emerges from 2027/28 and consideration of the housing trajectory in relation to historic growth levels of the District. Site promoted for development is within the identified town centre boundary. Noted that planning application for development of site refused.
LP2040 205	Des Dunlop (D2 Planning) for Bromford Housing Association	Strategic Policy SP14	No	No	No	Yes	Yes	The current Local Plan Strategy Core Policy 8 (Our Centres) sets out a positive framework for development within Burntwood Town Centre along with Local Plan Allocations Policy Burntwood 3 (Burntwood Economy). Burntwood Town Centre has failed to attract investment. The overall objective of the Local Plan is to redevelop and regenerate Burntwood Town Centre "to create a key focal point for the area". In this way, the Policy has regard to national policy and is in general conformity with the strategic policies of the development plan. However, as currently presented, by limiting the range of uses within specific parts of Burntwood Town Centre, Policy SP14 appears prescriptive and inflexible. Burntwood Town Centre is not currently thriving. Paragraph 85 of the NPPF requires planning policies to 'recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites'.  Objections to the policy as presently worded are made as they do not include residential use within the Town Centre. In any event, we believe that the Town Centre boundary should be redrafted so that land known as the Blue Hoarded site is removed from the Town Centre and identified for residential use.	No changes required.	Policy within the Local Plan 2040 supports development for town centre uses within the identified town centre boundary. This is supported by the plan's evidence base. It is also noted the recently adopted Burntwood Neighbourhood Plan identifies the town centre as an area where support for town centre development is given. Site promoted for development is within the identified town centre boundary. Noted that planning application for development of site refused.
LP2040 206	Des Dunlop (D2 Planning) for Bromford Housing Association	Chapter 13: Burntwood (Vision for Burntwood)	No	No	No	Yes	Yes	Support is given to Burntwood being maintained as a separate and freestanding community which offers a range of services and facilities to meet residents, businesses and visitors needs. In looking forward however, it is important that additional land is identified for residential development particularly on brownfield sites. London & Cambridge Properties control land at Milestone Way which is ideally placed for a well designed residential development.  The site has been allocated for uses for over 35 years and has not come forward. London & Cambridge Properties believe that the time has arrived that this site should be deallocated for Town Centre uses and reallocated for residential development. They own further land in Burntwood i.e. Olaf Johnson site which they believe is also identified for Town Centre uses. This site is extremely well located to the existing Town Centre.  It is noted that an Area Action Plan is being prepared for Burntwood. It is however imperative that this Local Plan sets out clearly the objectives for the preparation of any Area Action Plan and that the important decisions are not left for that Area Action Plan.  Ensure that the Local Plan provides a clear policy direction for the Area Action Plan.	No changes required.	Policy within the Local Plan 2040 supports development for town centre uses within the identified town centre boundary. This is supported by the plan's evidence base. It is also noted the recently adopted Burntwood Neighbourhood Plan identifies the town centre as an area where support for town centre development is given. Site promoted for development is within the identified town centre boundary. Noted that planning application for development of site refused.
LP2040 207	Des Dunlop (D2 Planning) for Bromford Housing Association	Local Policy B1: Burntwood Environment	No	No	No	Yes	No	Support is given to this policy in principle. It is recognised that within proximity of the settlement is the Cannock Chase AONB and Special Area of Conservation. However, on that basis the Local Plan should be proactive and identify various brownfield sites in Burntwood for future residential development e.g. Blue Hoarded site. In this way the Local Plan will meet future development needs without impinging on these environmental assets.	No changes required.	Support noted.

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LP2040 208	Des Dunlop (D2 Planning) for Bromford Housing Association	Local Policy B2: Burntwood Services and Facilities	No	No	No	Yes	Yes	<p>Objections are lodged to the continued allocation of land known as the Blue Hoarded site, Milestone Way, Burntwood for Town Centre Expansion.</p> <p>Paragraph 122 and 123 states that: 'Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan: a) it should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped)...'. The NPPF is clear that where land had been allocated for a use which has not come forward that the Planning Authority should take a proactive role in reallocating the site for a more deliverable use that can help address identified needs.</p> <p>The site has been allocated for Town Centre purposes continuously for over 35 years. The land owners have promoted a variety of retail and leisure schemes on the site not just in isolation but in combination with other land they own. In addition, they have also looked at the possibility of a new doctors surgery on the site but this was rejected by the NHS and County Council in favour of a site at Cherry Close, Burntwood. The recently 'made' Burntwood Neighbourhood Plan recognises the position with attracting retailers to the Town Centre.</p> <p>The time has now come for the Planning Authority to consider alternative uses which would meet an identified need. A residential use is more appropriate on the site and would help meet an identified need. If the Council are concerned about expansion of the Town Centre, the objectors own land at the Olaf Johnson site which is well placed to expand the Town Centre with a range of uses. Indeed, this site is better located than the application site for Town Centre expansion. Indeed, planning permission was granted for a retail scheme on the site in 2017 under Application No. 16/01379/FULM.</p>	No changes required.	Local Plan 2040 supports the redevelopment of brownfield sites. Site promoted is within the identified town centre boundary. Noted that planning application for development of site refused.
LP2040 209	Mark McFadden (CBRE) on behalf of St Modwen	SP13	No	No	No	No	Yes	Neither the Reg 19 Plan nor HEDNA provide a justification as to why the spatial strategy for Lichfield District has not considered accommodating unmet strategic employment needs or aspirations, and why this has not been considered in the evidence base. There is no consideration of the locational requirements of the priority sectors identified in the West Midlands Local Industrial Strategy nor Greater Birmingham and Solihull Local Economic Partnership's Strategic Economic Plan. The Plan does not recognise the role of the District's functional economic market area in driving employment needs and subsequent employment land requirements. Planning Practice Guidance is clear that functional economic market areas can overlap several authorities, so strategic policy-making authorities may have to carry out assessments of need on a cross-boundary basis with neighbouring authorities within their functional economic market area. In order to plan effectively for its functional economic market area, the quantum of employment land identified in Policy SP13 needs to be informed by evidence encompassing an understanding of qualitative as well as quantitative employment needs. It is considered that currently, SP13 and its supporting text is not clear how the Reg 19 Local Plan will deliver employment land required to meet the identified employment needs. This should be clarified, in order to effectively set out an overall strategy for the pattern, scale and quality of employment development, and make sufficient provision through specific allocations, in line with NPPF paragraph 20.	No changes required.	Local Plan 2040 identifies sufficient land to provide for the District's employment land requirements. Local Plan 2040 and supporting evidence note there is limited deliverable employment land within Lichfield District with only sufficient land to meet the District's needs. Note that the site promoted is allocated for employment uses within the adopted Local Plan.
LP2040 210	PT Knight	SHA2	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	Object to SHA2 allocation	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.
LP2040 211	Ben Burnett Rogers	SHA2	Unanswered	Unanswered	No	Yes	Yes	<p>Objections relate to SHA2 in the following aspects:</p> <ul style="list-style-type: none"> <li>• Transport &amp; Traffic Implications</li> <li>• Sustainability</li> <li>• Flood Risk</li> <li>• Green Belt</li> </ul> <p>We have major concerns about the impact of SHA2 on the local road network and we do not consider that the impact of traffic in relation to SHA2 has been fully explored or prepared. While we welcome the transport modelling work being delayed due to the pandemic as this would not have been a true reflection of the traffic levels in the locality. It is still premature to include SHA2 within LP2040, particularly when modelling work has not been undertaken, as it has not been justified that the impact on the local road network from SHA2 will be acceptable. Request that modelling work is undertaken while Drayton Manor Park is fully open otherwise the figures will not include the increased vehicle movements in the locality which occur nine months of the year.</p> <p>Consider SHA2 remains inappropriate housing development and disproportionate to the settlement of Mile Oak. The fact you have chosen to conjoin Mile Oak with the adjacent separate areas of Bonehill and Fazeley to 'create' a larger "rural village settlement" does not disguise nor lessen its impact.</p> <p>Consider flood risk has not been appropriately addressed at site, residents aware the site liable to groundwater flooding. Do not consider that SHA2 has been fully prepared and justified nor is the LP2040 sound. Fundamental evidence of the flood risk associated with SHA2 is yet to be undertaken and presumptions have been made in an attempt to justify its acceptability in principle.</p> <p>It is not clear from the current consultation as to where there is the full consideration of all reasonable alternatives given that sites which are not likely to harm the green belt have been simply discounted from the plan. The green belt review assessment of the parcels of land forming SHA2 are ambiguous.</p> <p>Remove SHA2 allocation</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.

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LP2040 212	Mr Burnett	SHA2	Unanswered	Unanswered	No	Yes	Yes	<p>Objections relate to SHA2 in the following aspects:</p> <ul style="list-style-type: none"> <li>• Transport &amp; Traffic Implications</li> <li>• Sustainability</li> <li>• Flood Risk</li> <li>• Green Belt</li> </ul> <p>We have major concerns about the impact of SHA2 on the local road network and we do not consider that the impact of traffic in relation to SHA2 has been fully explored or prepared. While we welcome the transport modelling work being delayed due to the pandemic as this would not have been a true reflection of the traffic levels in the locality. It is still premature to include SHA2 within LP2040, particularly when modelling work has not been undertaken, as it has not been justified that the impact on the local road network from SHA2 will be acceptable. Request that modelling work is undertaken while Drayton Manor Park is fully open otherwise the figures will not include the increased vehicle movements in the locality which occur nine months of the year.</p> <p>Consider SHA2 remains inappropriate housing development and disproportionate to the settlement of Mile Oak. The fact you have chosen to conjoin Mile Oak with the adjacent separate areas of Bonehill and Fazeley to 'create' a larger 'rural village settlement' does not disguise nor lessen its impact.</p> <p>Consider flood risk has not been appropriately addressed at site, residents aware the site liable to groundwater flooding. Do not consider that SHA2 has been fully prepared and justified nor is the LP2040 sound. Fundamental evidence of the flood risk associated with SHA2 is yet to be undertaken and presumptions have been made in an attempt to justify its acceptability in principle.</p> <p>It is not clear from the current consultation as to where there is the full consideration of all reasonable alternatives given that sites which are not likely to harm the green belt have been simply discounted from the plan. The green belt review assessment of the parcels of land forming SHA2 are ambiguous.</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.
LP2040 213	Robert Stewart	SHA2	No	No	No	No	No	<p>The plan does not comply with national planning policy on 'Protecting Green Belt Land' as SHA2 is in the greenbelt. The local plan is unsound as the exceptional reasons to justify 800 in this location in the green belt are not set out in the Local Plan.</p> <p>Important evidence such as traffic assessments at Mile Oak are missing and the results of the 2019 Green Belt Review have not been interpreted correctly.</p> <p>The allocation of SHA2 does not meet several strategic objectives and priorities set out in the Sustainability Appraisal, especially Sustainable Communities, Rural communities, climate change, countryside character and natural resources.</p> <p>The council has not consulted properly with the local community or considered the impact of the development on Tamworth residents.</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes policies relating to the protection and enhancement of the natural environment. Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence.
LP2040 214	Jon Suckley , Grasscroft Homes and Property	SP1	Unanswered	Unanswered	Unanswered	Unanswered	yes	<p>The policy directs the majority of future development to locations which includes 'land off hay end lane, Fradley' as one of the three strategic locations to meet Lichfield's housing needs. Grasscroft strongly supports the strategic housing allocation at land off Hay End Lane, Fradley under policy SHA3.</p>	No changes required.	Support for policy SHA3 is noted.
LP2040 215	Jon Suckley , Grasscroft Homes and Property	SP12	Unanswered	Unanswered	Unanswered	Unanswered	yes	<p>In principle Grasscroft does not object to the stepped housing approach proposed in policy SP12 on the grounds that it is not a rigid phased release of land for housing.</p> <p>The councils SHLAA published in Aug 2020 identifies Grasscroft site under SHLAA IS 313. Grasscroft agrees with SHLAA assessment of the site in that it has no known constraints however objects to the potential yield of 38 dwellings within 6-10 years. It is proposed that Grasscroft site can deliver around 60 dwellings within 1-5 years of the plan following adoption. Furthermore the SHLAA identifies the adjoining parcel of land to the west of Grasscroft site and to the south of Hay End Lane controlled by the Leavesley Group as potentially yielding 184 dwellings within 6-10 years. This site now has residential planning permission and is therefore capable of delivering housing within the next 5 years. Grasscroft strongly supports the allocation of land at Hay End Lane Fradley, as a strategic housing allocation however objects to the approximate number of new homes that is allocated for in policy SP12.</p> <p>Developers working together at this site have the capability of delivering around 750 dwellings and the necessary infrastructure requirements to deliver sustainable development. It is requested that SP12 and the appendix B concept statement is revised to reflect this. Land at Hay end Lane Fradley allocated the site for approximately 500 dwellings. The approximate field of the site has not changed from 50 and notwithstanding the representations set out above the strategic housing allocation can deliver 750 dwellings, the housing yield at the very least should be adjusted to take into account the addition of Grasscroft site. Accurately increasing the yield of the land at Hay End Lane, Fradley will not only deliver much needed open market and affordable housing in a sustainable location, but it will also reduce the impact on the natural environment and the pressure to adjust the Green Belt Boundaries in other parts of the Borough.</p>	No changes required.	Comments noted. Allocation yield is based upon evidence. It is noted that representor suggests site is deliverable within the first five years of the plan period. Five Year Supply evidence does not include sites without planning permission/allocation within the first five years.
LP2040 216	Jon Suckley , Grasscroft Homes and Property	SHA3	Unanswered	Unanswered	Unanswered	Unanswered	yes	<p>Grasscroft strongly supports the proposed SHA3 allocation and the inclusion of Grasscroft site correcting the omission in the local plan preferred options document. Grasscroft site which can deliver around 60 dwellings in the first 1-5 years of the plan following adoption. Grasscroft has reviewed policy SHA3 relating to design and infrastructure. In principle Grasscroft supports the policy wording.</p>	No changes required.	Support noted.
LP2040 217	Jon Suckley , Grasscroft Homes and Property	SP5	Unanswered	Unanswered	Unanswered	Unanswered	yes	<p>Grasscroft supports the need for new development to provide and contribute towards the timely delivery of necessary infrastructure. Grasscrofts site as part of the masterplan will make appropriate contributions towards necessary infrastructure at SHA3 housing allocation in accordance with planning policy requirements and the CIL regulations.</p>	No changes required.	Support noted.
LP2040 218	Jon Suckley , Grasscroft Homes and Property	INF1	Unanswered	Unanswered	Unanswered	Unanswered	yes	<p>Grasscroft has prepared a masterplan to set out key design principles and infrastructure requirements and are in principle willing to enter into a statement of common ground with the council prior to the local plan examination.</p>	No changes required.	Noted that a masterplan has been prepared.
LP2040 219	Jon Suckley , Grasscroft Homes and Property	INF1	Unanswered	Unanswered	Unanswered	Unanswered	yes	<p>Grasscroft has prepared a masterplan to set out key design principles and infrastructure requirements and are in principle willing to enter into a statement of common ground with the council prior to the local plan examination.</p>	No changes required.	Noted that a masterplan has been prepared.
LP2040 220	Jon Suckley , Grasscroft Homes and Property	SP6	Unanswered	Unanswered	Unanswered	Unanswered	yes	<p>Grasscroft supports the requirements for open spaces, playing pitches, sport, recreation, play facilities and cultural assets. In line with Grasscrofts comments in this statement it is requested that Grasscroft makes financial contributions in line with policy requirements and the CIL regulations towards the delivery of infrastructure including open space, playing pitches, sports and recreation and play facilities to be provided within SHA3 housing allocation.</p>	No changes required.	Support noted.
LP2040 221	Jon Suckley , Grasscroft Homes and Property	INF5	Unanswered	Unanswered	unanswered	Unanswered	yes	<p>Grasscroft supports the requirement for open space, in line with Grasscrofts comment in this statement, it is requested that Grasscroft makes financial contributions in line with policy requirements and the CIL regulations towards the delivery of infrastructure including open space to be provided within the SHA3 housing allocation as shown on the comprehensive masterplan.</p>	No changes required.	Support noted.
LP2040 222	Jon Suckley , Grasscroft Homes and Property	SP10	Unanswered	Unanswered	unanswered	Unanswered	yes	<p>Policy Sp10 is supported by Grasscroft.</p> <p>Bullet point 9 requires development to 'sustain and improve air quality with no decline in standards being deemed acceptable as a result of new development.' changes to be made to reword bullet point 9 : 'Sustain and improve air quality with no significant decline in standards being deemed acceptable'.</p>	No changes required.	Support noted.
LP2040 223	Jon Suckley , Grasscroft Homes and Property	SD1	Unanswered	Unanswered	Unanswered	Unanswered	yes	<p>Grasscroft has prepared a masterplan to set out key design principles and infrastructure requirements and are in principle willing to enter into a statement of common ground with the council prior to the local plan examination.</p>	No changes required.	Noted that a masterplan has been prepared.



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LP2040 224	Jon Suckley , Grasscroft Homes and Property	NR5	Unanswered	Unanswered	Unanswered	Unanswered	yes	SHA3 is located within Cannock Chase SAC policy area and is within 15km of the SAC. Grasscroft has appointed Rachel Hacking Ecology have prepared an Ecological assessment. A Habitats Regulation Assessment will be prepared to support Grasscrofts planning application	No changes required.	Comments noted.
LP2040 225	Gill Daniels	SHA2	No	No	No	Yes	No	<p>Not enough discussions with residents and other local communities in the area.</p> <p>The land is in 'Green Belt Land' which is not considered as 'sacred' anymore. Developing this land will cause so much congestion of roads, pressure on schools, roads, doctors and hospitals it is not viable.</p> <p>property at the risk of being devalued and causing more congestion on the roads.</p> <p>The junction at Mile Oak is already very busy, this will only increase with the development.</p> <p>the plans will not be effective as the infrastructure has not been considered. The knock on effect to the infrastructure has not been looked into enough. An extension to Robert Peel Hospital would be very north while and very necessary even now, let alone if more residents are brought into the area.</p> <p>With all the challenges of climate change, this proposal would make it worse. the loss of countryside will impact wildlife and there will be issues with flooding.</p> <p>If more houses are needed, find brownfield sites, not green belt.</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered.
LP2040 226	Paula Anne Roper	SHA2	No	No	No	Yes	No	<p>green belt, wild life and trees would go.</p> <p>A5 already blocked with traffic, no decent local hospital. It is very hard now to get on to Sutton road at the end of the working day.</p> <p>What has happened to save trees and wild life it will be lost with development.</p> <p>To think about global warming and more nature that will be destroyed.</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered.
LP2040 227	Patricia Hatley	SHA2	No	No	No	Yes	No	<p>The council have not worked within TBC and Fazeley Town Council or the local community to select SHA2. The council have ignored hundreds of objections to SHA2 raised by the local community.</p> <p>The plan doesn't comply with the NPPF protecting green belt land, a traffic assessment is missing, allocation of SHA2 does not meet several strategic objectives regarding the sustainability appraisal, climate change, rural communities, countryside character and natural resources. The council has not consulted properly with the local community or considered the impact of the development on Tamworth residents.</p> <p>Brownfield and sites not in the greenbelt should be chosen before SHA2.</p> <p>The council has not properly considered all reasonable alternatives to SHA2, further information should be collected such as traffic assessments, impact on local infrastructure, high school places. SHA2 is too big when compared to the size of the Fazeley ward.</p> <p>The local plan is not effective or deliverable considering the impact on traffic and infrastructure requirements.</p> <p>The local plan 2040 is not consistent with the following sections of the NPPF: Section 2, section 5, section 8, section 13, section 14, section 15</p> <p>Remove SHA2 from local plan 2040 , allocate another large site that is not in green belt and is closer to a train station.</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered.
LP2040 228	Derek Garratt	SHA2	No	No	No	Yes	No	<p>The council have not worked within TBC and Fazeley Town Council or the local community to select SHA2. The council have ignored hundreds of objections to SHA2 raised by the local community.</p> <p>SAH2 is in the green belt and the plan ignores NPPF on protecting Green Belt. Traffic assessments at mile oak have been ignored.</p> <p>Brownfield sites not in the greenbelt should be preferred option.</p> <p>The council have not considered all reasonable options to SHA2. SHA2 is to big for the existing Fazeley ward.</p> <p>Not enough consideration has been given to traffic using the A453 from Sutton to Tamworth.</p> <p>There is potential for flooding in mile oak and Fazeley, SHA2 will destroy the existing environment and damage the valuable countryside.</p> <p>Remove SHA2 from the plan, find a more suitable sight with better access to local transport.</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered.
LP2040 229	Alan Burton	SHA2	No	No	No	Yes	No	Remove SHA2 allocation, put strategic allocation outside of green belt site and close to a train station.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes policies relating to the protection and enhancement of the natural environment. Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence.

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LP2040 230	Janet Rowley (Lichfield's) on behalf of St Philips Ltd.	SHA1	N/A	No	No	Yes	Yes	<p>Object to Strategic Policy SHA1 on the basis of soundness. It fails the tests at NPPF paragraph 35 as it has not been positively prepared and is not justified or effective. Consider that there is a fundamental concern regarding the scale of development currently envisaged by the Council in the over reliance on the large urban extension proposed to the north of Lichfield under Policy SHA1. Concentrating over 70% of the draft Local Plan's strategic housing allocation apportionment in ne urban extension 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 envisaged by the Council, the housing figure is unlikely to be fulfilled and the housing needs will not be met.</p> <p>It is important to note that large strategic housing schemes typically experience long lead-in times, with long periods between allocation, applications and then development getting off the ground, with houses being completed on site. Research demonstrates that large sites (i.e. 2,000+ dwellings) can take – on average – 8.4 years from validation of the first planning application to the first dwelling being completed, and build out at an annual rate of c.160 dwellings.</p> <p>Concerns regarding the implications of the scale of development and its impacts on the setting of both Lichfield and Fradley. In particular, by virtue of the Council's reliance on Lichfield to deliver a majority of its housing needs, the Council is electing to allocate a significant swathe of land within the gap between the two settlements. The consequence of this is that the site extends Lichfield northwards, encroaching into the gap between Lichfield and Fradley, enveloping Curborough and Streethay and merging these settlements into Lichfield. Moreover, the resultant gap between the two settlements would, at points, be as narrow as 60m.</p> <p>Policy SHA1 and the housing trajectory should be amended to reduce the size and the yield to be delivered by this strategic allocation over the plan period and provide more dispersed growth to other sustainable locations within the District. Additional housing allocation sites should be identified in other sustainable locations, such as Fradley. This would reduce the risks of delays in delivery undermining the housing land supply position of the District.</p>	No changes required.	Comments noted, the proposed strategic housing allocations and wider housing delivery policies and strategies utilising a broad range of evidence bases the demonstrate sites and allocations are suitable and the most appropriate to deliver within the plan period.
LP2040 231	Janet Rowley (Lichfield's) on behalf of St Philips Ltd.	SP1	N/A	No	No	Yes	Yes	<p>St Philips object to Strategic Policy 1 (SP1) as it is currently drafted on the basis of soundness, as it is not considered that the Council's approach to the apportionment of housing growth is justified, will not be effective in maintaining sufficient housing land supply, and as such is not consistent with the NPPF. Wish to assert that, to ensure a sufficient land supply across the plan period that the Council does not rely solely on Lichfield to meet the majority of its needs, it should adopt a more balanced distribution of growth across the District, with an emphasis on those locations that are sustainable.</p> <p>Look at other allocations of a smaller scale to the SHA1 allocation</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. The Spatial Strategy, including proposed allocations, supported by Council's evidence base which informs the site selection process.
LP2040 232	Janet Rowley (Lichfield's) on behalf of St Philips Ltd.	SHA3	N/A	No	No	Yes	Yes	<p>St Philips object to the allocation SHA3 considered to be unsound on the basis that the selection of this site above other sites in Fradley has not been justified within the Sustainability Appraisal (SA). 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 that this is more favourable than other sites within Fradley. Without this evidence, there is a risk that the Plan could be considered unsound on the basis that the evaluation of reasonable alternatives has either not been undertaken or has been 'improperly restricted', in the context of the iterative process necessary for progressing a plan. This is in itself a significant shortcoming in the justification for the strategy and the Land north &amp; South Hay End Lane, Fradley, allocation.</p> <p>Allocate alternative site in Fradley</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. The Spatial Strategy, including proposed allocations, supported by Council's evidence base which informs the site selection process.
LP2040 233	Janet Rowley (Lichfield's) on behalf of St Philips Ltd.	SP12	N/A	No	No	No	Yes	<p>The Council should allocate additional smaller and medium-sized deliverable housing sites, which are able to come forward and contribute towards housing supply within the earlier stages of the plan period.</p>	No changes required.	Local Plan 2040 allocated four strategic housing allocations. Local Plan 2040 includes allocations from adopted Local Plan as set out at Appendix D of the Local Plan 2040. This includes a range of allocations in terms of size and location.
LP2040 234	Liberty Stones (Fisher German) for Bloor Homes	Strategic Policy 1	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	<p>Has land interests at Fradley Lane, site is not constrained by Green Belt and is sustainable, suitable and deliverable and could provide 372 dwellings and open space. Plan period is generally supported. Whilst the principle of Lichfield District accommodating new homes to help meet the unmet needs from the GBBCHMA is supported, Bloor Homes are concerned that both the amount of homes planned for to meet housing need arising in Lichfield and the quantum of unmet need the Council is planning for is too low and not clearly justified. The GBBCHMA Housing Need and Housing Land Supply Position Statement (July 2020) advises that taking into account recent monitoring for the 2011 – 2031 period, the shortfall is now 2,597 dwellings. The Statement adds that it is considered that "the pre 2031 shortfall will continue to fall as local plan reviews progress as indicated in Appendix 2. Appendix 2 of the Position Statement sets out a table of all the LPAs within the HMA and the contribution each of the LPAs are expected to make to the unmet need. Therefore, it is clear that the HMA unmet need for the pre 2031 period will only be met if the various HMA authorities deliver the numbers of homes as indicated in Appendix 2. Regarding Lichfield District, it is significant to note that this sets out that Lichfield will make a 4,500 dwelling contribution to unmet needs. The Position Statement is already outdated in that it precedes recent changes to the Standard Methodology which significantly increase the level of housing need in Birmingham; an increase from 4,450 dpa, as established through the OAN, to 5,000 dpa through the Standard Method (2020 affordability adjustment) and finally to 6,750dpa when the 35% increase is applied. If the emerging Plan does not deliver the unmet need figure of 4,500 dwellings, as a minimum, the pre 2031 GBBCHMA shortfall will not be met in full. The Council's assertion therefore that the unmet need has been "dealt with" is simply not true if the emerging Lichfield District Plan fails to plan for the 4,500 dwellings (unmet need) which the wider HMA is expecting it to, and could give rise to claims that the Council have not complied with the Duty to Cooperate. It is considered that a figure in the region of 6,000 dwellings should be planned for in addressing the unmet need (this could provide 4,500 dwellings for the need up to 2031 and 1,500 for needs emerging post 2031). Additional growth should be directed to the Level 2 and Level 3 settlements. Land at Fradley Lane could deliver a sensitively designed scheme of up to 372 homes, extensive open space, and the safeguarding of land to deliver future improvements to the Fradley Lane/A38 Junction. The supporting text to Strategic Policy 1 states that the unmet housing need will "begin to arise part way through the plan period". This is not the case. The GBBCHMA Housing Need and Housing Land Supply Position Statement, advises that The Black Country has evidenced a significant shortfall, through its 2019 Urban Capacity Review Update, of up to 29,260 dwellings between 2019 and 2038, against LHN. The delivery of over half of the District's growth to a single settlement (and site) puts the delivery of the Plan, as a whole, at risk. Additional growth should be directed to the Level 2 and Level 3 settlements in order to better reflect the role of these settlements, ensure their vitality and viability and to provide a greater mix of housing sites providing a wider choice to the market.</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Contribution was decreased following the publication of the latest GBBCHMA position statement (published 2020) which indicated that BC shortfall emerges from 2027/28 and consideration of the housing trajectory in relation to historic growth levels of the District.

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LP2040 235	Liberty Stones (Fisher German) for Bloor Homes	Strategic Policy 12	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	<p>Has land interests at Fradley Lane, site is not constrained by Green Belt and is sustainable, suitable and deliverable and could provide 372 dwellings and open space.</p> <p>It is considered essential that the Plan is flexible and meets exiting unmet need the Authority have already committed to deliver, as well as future unmet needs that will arise from the Black Country (and potentially Birmingham) in the latter part of the Plan period. The best way to ensure the Plan can respond at the appropriate time is to ensure that sufficient housing land has been allocated and is readily available to contribute to that need when it arises. It is therefore considered that a figure in the region of 6,000 dwellings should be planned for in addressing the unmet need (this could provide 4,500 dwellings up to 2031 and 1,500 dwellings for needs emerging post 2031); creating a total housing requirement of 13,062 dwellings to be delivered over the Plan period.</p> <p>It is considered that the delivery of over half of the District's growth to a single settlement (and site i.e. land to the north-east of Lichfield) risks the delivery of the Plan, as a whole. Additional growth (to include the unmet need, discussed above) should be directed to the Level 2 and Level 3 settlements in order to better reflect the role of these settlements, ensure their vitality and viability and to provide a greater mix of housing sites providing a wider choice to the market.</p> <p>Settlements, such as Fradley, are outside of the Green Belt and highly sustainable offering extensive services and facilities. In the case of Fradley it also offers a significant range of employment opportunities within the settlement itself. Fradley is therefore able and capable of delivering more homes than currently planned for. Land at Fradley Lane could deliver a sensitively designed scheme of up to 372 homes, extensive open space, and the safeguarding of land to deliver future improvements to the Fradley Lane/A38 Junction, as suggested in Strategic Policy 4: Transport Safeguarding.</p> <p>It is considered that a figure in the region of 6,000 dwellings should be planned for in addressing the unmet need (this could provide 4,500 dwellings for the need up to 2031 and 1,500 for needs emerging post 2031). Additional growth should be directed to the Level 2 and Level 3 settlements.</p> <p>Land at Fradley Lane could deliver a sensitively designed scheme of up to 372 homes, extensive open space, and the safeguarding of land to deliver future improvements to the Fradley Lane/A38 Junction</p>	No changes required.	<p>Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence.</p> <p>Contribution was decreased following the publication of the latest GBBCMA position statement (published 2020) which indicated that BC shortfall emerges from 2027/28 and consideration of the housing trajectory in relation to historic growth levels of the District.</p>
LP2040 236	Jane Field (Environment Agency)	Strategic Policy 8	Unanswered	Unanswered	unanswered	Unanswered	Unanswered	<p>Over abstracted Bourne/Black Brook catchment and the Lichfield and Shenstone Ground Water Management Unit may impact current and future developments. The catchment has been classified as 'stressed'. In order to support the restoration of natural water resources in the area, infiltration drainage should be maximised to allow recharge. it is felt that Policy SP8 could go further to promote infiltration drainage.</p> <p>We welcome the locally specific element of the following policy section, but query where the details of these catchments have been taken from, and why it cannot apply to the whole district.</p> <p>Clarity on the definition of viability may be useful here as our information indicates soils derived from the local geology are predominantly described as sandy over red sandstone.</p> <p>We would welcome the provision of safeguarding land for flood risk management purposes, in with planning policy guidance which states 'if an area is intended to flood, e.g. an upstream flood risk management purposes, in line with the planning policy guidance which states 'if an area is intended to flood, e.g. an upstream flood storage area designed to protect communities further downstream, then this should be safeguarded from development and identified as function floodplain, even though it might not flood very often.</p> <p>We recommend the following changes are made to strengthen this aspect of the plan: 'requiring new development to incorporate suitable sustainable drainage systems (SuDs) in the view of the local authority to manage surface water drainage; to avoid any increase on site or elsewhere; and to protect and improve the quality and quantity of waters in the receiving watercourse and underlying aquifer'.</p> <p>We recommend the omission of the 'should seek' element, a requirement that an assessment is made of this opportunity and to ensure it occurs whenever possible.</p> <p>Change in wording to para 5 of SP8 (See page 2 of rep). An additional point should be added regarding flood plain safeguarding. (see page 3 of rep)</p>	No changes required.	<p>Comments noted. Wording of policy in relation to sustainable urban drainage is considered to be appropriate.</p>
LP2040 237	Philippa Kreuser (CT Planning) for Essington Park Ltd	Policy Maps Inset 4	Unanswered	Unanswered	No	Yes	Yes	<p>Objects to the inclusion of the site within the Local Green Space as shown on Inset 4: Alrewas. Paragraph 13 of the Framework advises that Neighbourhood Plans should support the delivery of strategic policies contained in local plans or spatial development.</p> <p>It is noted that there is no policy contained in the Proposed Publication Document relating to Local Green Space. It may be the case that the Local Green Space is identified in Policy EC4 of the made Alrewas Neighbourhood Plan. However, there is no evidence in the Proposed Publication Document that the strategic policy making authority has considered the consequences for sustainable development in Alrewas or beyond of retaining the Local Green Space.</p> <p>It is submitted that the retention of Local Green Space frustrates the ability to provide sufficient housing in Alrewas commensurate to its status as a Larger Service Village and the stated Vision for Alrewas. The Local Green Space shown on Inset 4 comprises in excess of 8 hectares. It is an extensive tract of land; by virtue of its size, the site is simply too large to perform as a Local Green Space. The detailed designation of the Local Green Space boundaries should follow the principles of defining Green Belt Boundaries provided for at paragraph 139 of the Framework. In other words, any boundaries for Local Green Space should be consistent with the Local Plan Strategy for meeting identified development requirements for sustainable development.</p> <p>It is submitted that the boundary to the Canal and Riverbank Local Green Space, if it is to be retained, has been too tightly drawn to endure; it makes no provision for the future development of Alrewas in this plan period and beyond.</p> <p>If the Local Green Space is to be retained, then it should be amended to exclude the site edged red on the submitted drawing; this site adjoins the defined Development Boundary for Alrewas and is evidently well located to meet its development requirement now and in the future.</p> <p>Inset 4 Alrewas should therefore be amended to delete the Canal and Riverbank Local Green Space, and in its place:</p> <p>1. Allocate up to 20 dwellings on the land edged red on submitted drawing</p> <p>2. Allocate the land shown on submitted Landscape and Open Space Masterplan as Community Open Space</p>	No changes required.	<p>Local Green Space is allocated within the Alrewas Neighbourhood Plan which was adopted in 2018. Policy within the neighbourhood plan relates to the Local Green Space and therefore is not duplicated within the Local Plan 2040. Alrewas neighbourhood plan has been examined and adopted.</p>

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LP2040 238	Philippa Kreuser (CT Planning) for Essington Park Ltd	SP1 SP12 SHA1	Unanswered	Unanswered	No	Yes	Yes	<p>Support the inclusion of Alrewas as a Level 3 – Larger Service Village in the Settlement Hierarchy as set out in Table 4 to Strategic Policy 1 : The Spatial Strategy in the Proposed Publication Document.</p> <p>Object to the failure to identify Alrewas as a location for a new housing allocation. If Lichfield District Council is to stand any reasonable prospect of achieving its housing delivery of between 321-526 new homes per year over the plan period it needs to identify more than the 4 sites allocated at Strategic Policy 12: Housing Provision. Although the Council have delivered some 1321 new homes within the District at an average rate of 660 dwellings for the 2 year period 2018-2020, the previous 10 years supplied only 276 dwellings on average per year. This is, in part, a reflection of the reliance of the large scale housing allocations in the Local Plan Strategy which take a long period of time to deliver dwellings. The Proposed Publication Document continues to rely on such large scale allocations.</p> <p>The Proposed Publication Document relies on only 4 strategic housing allocations to deliver some 4675 dwellings. If one or more of these is delayed in coming forward, then there is a risk that the housing requirement for Lichfield will not be delivered on time. In such circumstances it is submitted that there is a need to identify additional small and medium sized housing sites that are likely to built out more quickly.</p> <p>The extent of the strategic allocation SHA1 at North of Lichfield is too extensive and of too great a magnitude at 3300 dwellings and will inevitably take a considerable length of time to be brought forward. The quantum of development at the North of Lichfield allocation should be reduced and the balance of new dwellings be reallocated to small and medium sized sites across the Larger Service Villages of the District, such as Alrewas in line with national planning policy.</p> <p>One such allocation to be added to Strategic Policy 12 is Land North of Dark Lane, Alrewas for up to 20 dwellings. 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 proposed development would represent a logical extension to the Development Boundary of Alrewas and will provide for a balanced and sustainable development. A development of the land off Dark Lane, Alrewas for up to 20 houses 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 Alrewas unless a housing allocation is made for Alrewas.</p>	No changes required.	<p>Housing requirement within the Local Plan 2040 provides for the Local Housing Need (LHN) as established by the Standard Methodology and supported by evidence within the HEDNA.</p> <p>Local Plan 2040 proposes to provide 2665 dwellings to meet unmet needs from the GBBCHMA with 2000 towards the shortfall arising from the Black Country. This is in addition to unmet need provided in the adopted local plan. The 2020 Position Statement identifies that the unmet need arising from the Black Country will emerging from 2027/28. Local Plan 2040 proposes four strategic allocations and includes a significant number of smaller 'saved' allocations from the current local plan which will continue to deliver significant homes to meet the housing requirement to 2040. Site promoted is located within the Local Green Space which was designated through the adopted Alrewas Neighbourhood Plan.</p>
LP2040 239	Hilary Evans	SHA2	No	No	No	Yes	No	<p>The plan does not comply with national planning policy on 'Protecting Green Belt Land' as SHA2 is in the greenbelt. The local plan is unsound as the exceptional reasons to justify 800 in this location in the green belt are not set out in the Local Plan. Important evidence such as traffic assessments at Mile Oak are missing and the results of the 2019 Green Belt Review have not been interpreted correctly.</p> <p>The allocation of SHA2 does not meet several strategic objectives and priorities set out in the Sustainability Appraisal, especially Sustainable Communities, Rural communities, climate change, countryside character and natural resources.</p> <p>The council has not consulted properly with the local community or considered the impact of the development on Tamworth residents.</p> <p>Remove SHA2 allocation, put strategic allocation outside of green belt site and close to a train station.</p>	No changes required.	<p>LPA has worked with infrastructure providers to support the development. Site is selected having regard to evidence base in Green Belt study and because exceptional circumstances exist to meet identified housing need.</p>
LP2040 240	Jane Field (Environment Agency)	Strategic Policy 9	Unanswered	Unanswered	unanswered	Unanswered	Unanswered	<p>Further to the water cycle study and the identification in chapter 7 potential issues with the current capacity of sewage treatment works serving the district and their capacity in relation to opposed growth levels, both in and outside the district . In line with the WCS recommendations we advise this is flagged within this policy in order to ensure that developers engage early with Severn Trent Water and phase their development accordingly in line with anticipated sewerage upgrades to avoid potential water pollution occurrences.</p> <p>Additional wording for SP9 suggested in response regarding consultation with Severn Trent Water ahead of progression of any potential development to ensure wastewater infrastructure is in place.</p>	No changes required.	<p>Local Plan 2040 includes policies to require appropriate infrastructure be delivered.</p>
LP2040 241	Jane Field (Environment Agency)	H3	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	<p>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.</p> <p>it is recommended that the policy H3 is reworded to this effect: the site should be located within flood zone 1, or where this is demonstrated not to be possible via the application of the sequential test, flood zone 2 only where it meets the requirements of the exception test.</p> <p>Curborough Brook should be incorporated into the red line boundary.</p>	No changes required.	<p>Sequential approach is set out within national planning policy and therefore is not required to be duplicated within the Local Plan 2040.</p>
LP2040 242	Jane Field (Environment Agency)	SHA1	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	<p>It is recommended that a red line boundary of the site is extended to incorporate the brook in order to provide opportunities for flood risk.</p> <p>It is recommended that wording is adjusted to more closely align with the recommendations of the level 2 SFRA (detail on page 4).</p> <p>the red line boundary should include the Bourne Brook.</p>	No changes required.	<p>Boundary of the allocation considered to be appropriate and is based upon evidence including land availability evidence.</p>
LP2040 243	Jane Field (Environment Agency)	SHA2	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	<p>The following statement should be included in the 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.it is recommended that more specifics are taken from the recommendations of the Level 2 SFRA.</p>	No changes required.	<p>Boundary of the allocation considered to be appropriate and is based upon evidence including land availability evidence.</p>
LP2040 244	Susan Parkinson	SHA2	No	No	No	Yes	No	<p>LDC has not worked with local communities to select SHA2 at Mile Oak. LDC has ignored hundreds of objections to SHA2.</p> <p>The plan does not comply with protecting Green Belt land as site SHA2 is in the greenbelt. Allocation of SHA2 does not meet strategic objectives. The council has not properly consulted with the local community</p> <p>LDC have not considered alternatives to SHA2. traffic assessments of mile oak, impact on local infrastructure not included. 29% of allocations of houses in rural areas is too high.</p> <p>brownfield sites and non greenbelt sites should be sued before green belt.</p> <p>The plan is not effective or deliverable when taking into account implications of SHA2. SHA2 is in greenbelt which is contrary to NPPF Remove SHA2 from the local plan 2040. allocate another large site that is not in the green belt and is closer to a train station.</p>	No changes required.	<p>Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered.</p>



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LP2040 245	Steve Robb, Avison Young and Dobbies Garden Centres	S2	Yes	Yes	Yes/no to NPPF	Yes	No	<p>Dobbies wish to ensure that in the future, they will continue to have sufficient flexibility to allow for further investment and innovation at the garden centre to ensure the business can remain at the forefront of retailing trends and can meet the ever - changing requirements of their customer base.</p> <p>It is noted that the site is proposed for allocation as part of the green belt, as per its current designation within the adopted development plan. this could limit our clients potential to invest at the garden centre and prevent them creating local jobs and stimulating further economic growth in the countryside.</p> <p>The clients site was given designation 119 through this process and assessed against the 5 main purposes of the Green Belt set out under NPPF at paragraph 138. Further assessment of purpose 1, purpose 2, purpose 3, purpose 4, purpose 5.</p> <p>The conclusions are not agreed with given the heavily developed garden centre site itself. the review only acknowledges that the site has a minor role for Green Belt purposes but this is based on the concern of there being an islanded pocket of green belt release. We do not agree that this conclusion given the minor distance between the settlement and the extend of developed land, comprising the garden centre and overflow car park. As a result, we do not consider that the local plan out for consultation is 'sound'. We therefore request that the site instead be incorporated within the settlement boundary of Shenstone, affording the garden centre opportunity to grow in future and deliver a number of the economic benefits that have led to the approvals for office development on sites further north of the garden centre, on the site known as 'Lichfield South'.</p> <p>Dobbies request that the garden centre as outlined in appendix 1 is allocated as part of the Shenstone settlement, which would allow future investment and appropriate development to come forward at the site.</p>	No changes required.	Site is located within the Green Belt and is disconnected from the settlement boundary of Shenstone. Local Plan 2040 is supported by evidence including Green Belt Review. It is not considered appropriate to remove the land promoted from the Green Belt.
LP2040 246	Philip Rawle, PDR Planning on behalf of Robert Ellam Vistry Homes and Greenlight Development	SP12	No	No	No	Yes	Yes	<p>Ensuring that the plan has been prepared with the duty to cooperate is an essential pre-requisite and cannot be avoided.</p> <p>GL Hearn: Housing and Economic Development Need Assessment - update, November 2020 states the standard methodology only calculates the minimum need and there maybe reasons for the council to adopt a higher requirement in excess of this number.</p> <p>The council should be seeking to make a provision for a 9% of the total unmet needs of the GBBCHMA. This equates to 5,500 dwellings above the districts own housing needs.</p> <p>The plan cannot be legally compliant in its current form.</p> <p>In terms of policy SP12 both NPPF and PPG are clear that the LHN figure generated by the standard method is a minimum starting point (i.e. 'actual' housing need may be higher than this figure).</p> <p>It is 'actual' housing need that represents the objectively assessed need which the tests in para 11 of the NPPF apply, and there is also a requirement for the council to test reasonable alternatives. the council should actively identify whether there are reasons for testing higher figures as estimates of housing need.</p> <p>The knock on effect to the LP 2040 and the HMA shortfall is that further housing sites will need to be identified within the district to accommodate this shortfall.</p> <p>SP12 the plan makes no contribution to the HMA shortfall, or if it is accepted that it is making a contribution, this contribution (against the functional housing market relationship analysis undertaken), it is inadequate (at 2,665 dwellings 'v' c.5,500 dwellings). in either circumstance, the knock-on consequence of this, is that further housing sites will need to be identified within the District</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Contribution was decreased following the publication of the latest GBBCHMA position statement (published 2020) which indicated that BC shortfall emerges from 2027/28 and consideration of the housing trajectory in relation to historic growth levels of the District.
LP2040 247	Philip Rawle, PDR Planning on behalf of Robert Ellam Vistry Homes and Greenlight Development	SP13	No	No	No	Yes	Yes	<p>Ensuring that the plan has been prepared with the duty to cooperate is an essential pre-requisite and cannot be avoided.</p> <p>GL Hearn: Housing and Economic Development Need Assessment - update, November 2020 states the standard methodology only calculates the minimum need. The council should be seeking to make a provision for a 9% of the total unmet needs of the GBBCHMA. This equates to 5,500 dwellings above the districts own housing needs.</p> <p>Through Policy SP13, Vistry and Greenlight question why the council is seeking to amend the wording of the currently adopted policy, policy EMP1 of the LP allocations.</p> <p>There is a noticeable change in the nature of the first para between the two policy approaches to the change from traditional employment uses/development to non-employment uses/development. policy EMP1 is written in a positive manner, whereas policy SP13 is written in a negative manner. Vistry and Greenlight developments questions this change in the tone of the policy. However this is not carried forward into the paras two and three which are written the same in the positive. The 'only' should be dropped, so that the policy is consistent with the text in adopted policy EMP1.</p> <p>Policy EMP1 was endorsed as sound by inspector Mike Fox through the examination of this plan in 2019, to our knowledge, nothing has changed in terms of national planning policy that would justify removing/altering a policy.</p> <p>In terms of effectiveness of policy SP13 Vistry and Greenlight make the point that there should be no ambiguity. The policy needs to be drafted so that is very clear to the reader that the policy deals with three alternative routes which planning permission may be granted, in accordance with the policy for proposals outside the traditional employment use classes of B1 (now E), B2 and B8. The first paragraph if its terms are satisfied, would allow permission to be granted for other job-creating proposals (including retail and leisure)</p> <p>Policy SP13 needs to be drafted exactly the same way as policy EMP1 of the Lichfield district plan allocations.</p>	No changes required.	Comments noted. Proposed policy wording is considered to be appropriate and provides clarity. Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Contribution was decreased following the publication of the latest GBBCHMA position statement (published 2020) which indicated that BC shortfall emerges from 2027/28 and consideration of the housing trajectory in relation to historic growth levels of the District. Site promoted for development is within the identified town centre boundary. Noted that planning application for
LP2040 248	Katherine Else (Claremont Planning) on behalf of the Harworth Group (Claire Biddle)	Paragraph 3.11 (page 30)	Yes	Yes	No	Yes	Yes	<p>Objects to Strategic Objective 1 on page 30 as currently drafted. It is considered that there is opportunity to allocate additional residential land at Burntwood that has been omitted from the Strategic Objective.</p> <p>The Local Plan as currently drafted suggests creating a sustainable urban extension for Lichfield city and that an Area Action Plan (AAP) will be produced for Burntwood. It is considered that addressing the planning needs of Burntwood for the future within an AAP is not the correct approach. Strategic housing needs should be allocated within the Local Plan and Burntwood is a suitable location for strategic residential allocation and this should be identified within Strategic Objective 1.</p> <p>The plan as currently drafted does not include any allocations at Burntwood, despite it being one of the most sustainable settlements in the District as confirmed by its position in the settlement hierarchy. As a result, the spatial strategy proposed in the Plan is not the most appropriate and not effective, as it does not propose large-scale development at Burntwood and instead proposes large-scale development at less sustainable locations within the District.</p>	No changes required.	

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LP2040 249	Katherine Else (Claremont Planning) on behalf of the Harworth Group (Claire Biddle)	Map 1	Yes	Yes	No	Yes	Yes	<p>Objects to the omission of their site on land off Hospital Road, Burntwood as a strategic housing allocation identified on Map 1: District Key Diagram.</p> <p>The site on land off Hospital Road, Burntwood provides an excellent opportunity to meet the future housing needs of the District. Initial proposals identified within the accompanying Vision Document for the site have been drawn up for a development of around 1,300 homes including affordable housing and housing for older people, with primary school/local amenities, public open space, pedestrian and cycle links and landscaping. Technical considerations have been addressed and there are no fundamental obstacles to the delivery of the site. Issues relating to ground conditions and contaminated land, utilities, flood risk and drainage, heritage and archaeology, highways and transport, noise and air quality and ecology have been considered and details of these findings are provided in the Vision document.</p> <p>The plan as currently drafted does not include any allocations at Burntwood, despite it being one of the most sustainable settlements in the District as confirmed by its position in the settlement hierarchy. As a result, the spatial strategy proposed in the Plan is not the most appropriate, as it does not propose large-scale development at Burntwood and instead proposes large-scale development at less sustainable locations within the District. As currently drafted, the Plan does not contribute to the achievement of sustainable development, whilst insufficient sites are proposed for allocation</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.
LP2040 250	Katherine Else (Claremont Planning) on behalf of the Harworth Group (Claire Biddle)	Table 4	Yes	Yes	No	Yes	Yes	<p>Objection is raised however to the identification of just 4% of housing to be located in Burntwood. This is a disproportionately low level of housing for a settlement of this size and has the smallest proportion of housing of all Tier 2 settlements. Strategic Housing allocations have been identified within the Tier 3 settlements at Fazeley, Mile Oak &amp; Bonehill, Fradley and Whittington to assist in meeting the strategic requirements and 29% of housing is identified within the tier 3 settlements which are less sustainable than Burntwood that is located in a higher category of the settlement hierarchy.</p> <p>In respect of Lichfield city 55% of housing has been allocated there including land north-east of Lichfield as a strategic allocation. Whilst it is recognised that Lichfield is the most sustainable location to locate housing as it is in the highest tier of the settlement hierarchy, it is considered that a more even distribution should be made around the District and more housing should be allocated at Burntwood. There is concern that reliance on one large strategic allocation north-east of Lichfield may have implications in regard to deliverability and viability, particularly given the large-scale infrastructure improvements that will be required to deliver this site, concern is raised in regard to this proposed allocation as its represents a significant proportion of the District's future housing delivery across the plan period. In addition, 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.</p> <p>The spatial strategy proposed in the Plan is not the most appropriate, as it does not propose large-scale development at Burntwood and instead proposes large-scale development at less sustainable locations within the District. Promoting growth at less sustainable locations such as this is likely to result in unsustainable patterns of growth, including travel patterns for future residents. This is highlighted in the Sustainability Appraisal, which recognises that development at Hospital Road Burntwood would score more favourably in respect of encouraging the use of existing or provide sustainable modes of travel, than the sites allocated at Fazeley, Fradley and Whittington.</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.
LP2040 251	Katherine Else (Claremont Planning) on behalf of the Harworth Group (Claire Biddle)	Chapter 13: Burntwood (Vision for Burntwood)	Yes	Yes	No	Yes	Yes	<p>Objects to 'The vision for Burntwood' on page 118 of the Plan. As currently drafted the vision and policies for Burntwood do not identify the need for affordable homes and homes for older people and it does not allocate strategic development sites to assist in meeting the District requirements and wider needs from Greater Birmingham and the Black Country housing market area. Considers that addressing the planning needs of Burntwood for the future within an AAP is not the correct approach. Strategic housing needs should be allocated within the Local Plan and Burntwood is a suitable location for strategic allocation, and this should be identified within the vision for Burntwood.</p> <p>As currently drafted the plan does not meets the requirements of NPPF. In particular the need for a range of different types of housing to be provided to ensure balanced and mixed communities.</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.
LP2040 252	Katherine Else (Claremont Planning) on behalf of the Harworth Group (Claire Biddle)	Paragraph 3.3	Yes	Yes	No	Yes	Yes	<p>Support the key issues identified at paragraph 3.3, in particular the following:  - 'Meeting the strategic housing and employment requirements for our district, including assisting in meeting needs from the wider Greater Birmingham and the Black Country housing market area  - Addressing the lack of affordable housing, and also housing that meets specialist needs, including for older persons, people wishing to build their own home (self and custom builders) and provision for gypsies and travellers  - Ensuring the delivery of market and affordable homes to meet identified needs'</p> <p>Concern is raised however that the proposed housing requirements set out in later parts of the Plan do not provide sufficient levels at the right locations to meet the needs identified from the wider Greater Birmingham and Black County housing market area identified and does not go far enough in addressing the lack of affordable housing and housing for older people across the District and therefore these key issues will not be fulfilled. It is considered that the Local Plan should identify appropriate strategic locations for additional housing such as Burntwood given its position in the settlement hierarchy as the second largest settlement in the District and the sustainability credentials afforded to it.</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.
LP2040 253	Katherine Else (Claremont Planning) on behalf of the Harworth Group (Claire Biddle)	Paragraph 3.7	Yes	Yes	No	Yes	Yes	<p>Objects to the omission of the identification for the need to allocate strategic housing sites within Burntwood within Paragraph 3.7. Burntwood is a sustainable location for additional housing particularly given its position as the second largest settlement in the hierarchy. As currently drafted, the Plan fails to recognise the need for housing land to address existing and future need for open market and affordable housing, as well as housing for older people to be provided for at this settlement. It is apparent from the evidence base compiled that the town's urban areas has a very limited capacity that must accommodate housing, infrastructure and employment development – which is not tenable based upon the tightly drawn settlement boundary proposed.</p> <p>The plan as currently drafted does not include any allocations at Burntwood, despite it being one of the most sustainable settlements in the District as confirmed by its position in the settlement hierarchy. As a result, the spatial strategy proposed in the Plan is not the most appropriate, as it does not propose large-scale development at Burntwood and instead proposes large-scale development at less sustainable locations within the District. It is considered that in order to ensure that the Plan proposes a wholly sustainable strategy for development, additional allocations should be identified at Burntwood. The town represents one of the most sustainable locations within the District, and benefits from existing infrastructure that could support additional growth</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.
LP2040 254	Katherine Else (Claremont Planning) on behalf of the Harworth Group (Claire Biddle)	Paragraph 4.7	Yes	Yes	No	Yes	Yes	<p>Paragraph 4.17 has stated that the responses from the consultations have been rigorously assessed and integrated where possible into the new policies. It is considered however that the Plan has failed to allocate the site located off Hospital Road, Burntwood as a strategic allocation for housing to assist in meeting the District housing needs and unmet housing needs arising from the wider Greater Birmingham and Black Country housing market area. This is particularly pertinent given the settlement's position in the settlement hierarchy and the sustainability credentials afforded to it.</p> <p>The plan has not provided significant justification as to why the omission site at Hospital Road, Burntwood has not been allocated for development despite being promoted through earlier stages of the plan process.</p> <p>Neither does the plan or supporting evidence base demonstrate why the growth of Burntwood has been artificially restricted and that the opportunity of Green Belt release has not been progressed. There is no planning justification of why the settlement is to be constrained with only political nuances identified as the reasoning for the complete disregard of investment in the town through strategic scaled growth to meet the forthcoming housing and economic needs</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.



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LP2040 255	Katherine Else (Claremont Planning) on behalf of the Harworth Group (Claire Biddle)	Paragraph 4.24	Yes	Yes	No	Yes	Yes	<p>Objects to the omission of their site at Land at Hospital Road, Burntwood as a strategic allocation identified within Paragraph 4.24 of the Local Plan.</p> <p>It is considered that the Local Plan should identify appropriate strategic locations for additional housing within Burntwood given its position in the settlement hierarchy as the second largest settlement in the District and the sustainability credentials afforded to it. The Council have identified that strategic changes will be made to the Green Belt around Fazeley, Mile Oak &amp; Bonehill and Whittington to meet strategic development needs. It has not however identified strategic changes around Burntwood to meet strategic development needs and objection is raised in respect of this approach as the plan has not been positively prepared.</p> <p>The site off Hospital Road, Burntwood provides an excellent opportunity to meet the future housing needs of the District. Initial proposals for the site have been drawn up for a development of around 1,300 homes including affordable housing and housing for older people with primary school/local amenities, public open space, pedestrian and cycle links and landscaping. Technical considerations have been addressed and there are no fundamental obstacles to the delivery of the site.</p> <p>The plan as currently drafted does not include any allocations at Burntwood, despite it being one of the most sustainable settlements in the District as confirmed by its position in the settlement hierarchy. As a result, the spatial strategy proposed in the Plan is not the most appropriate, as it does not propose large-scale development at Burntwood and instead proposes large-scale development at less sustainable locations within the District.</p> <p>The over-reliance upon allocations of such a strategic scale that substantial infrastructure will be necessary will prohibit early delivery and cause a delayed trajectory. Such a strategy will not meet the identified affordable needs of the district or the demand arising from cross-boundary pressures.</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.
LP2040 256	Katherine Else (Claremont Planning) on behalf of the Harworth Group (Claire Biddle)	Paragraph 4.35	Yes	Yes	No	Yes	Yes	<p>Objects to the current drafting of paragraph 4.35 that identifies that following the adoption of the Lichfield Local Plan, the authority intends to develop a detailed Area Action plan (AAP) for Burntwood. This does not provide any certainty for how Burntwood will be developed. The planning needs of Burntwood should be addressed now within the Local Plan rather than being delayed through the production of an AAP after the Local Plan's adoption. This is pertinent given the housing needs for the area and in particular the needs for affordable housing and housing for older people in the area. The Council should adopt a proactive approach to housing delivery for Burntwood now rather than delaying its future policy management through a delayed AAP.</p> <p>The Plan does not accord with NPPF it is not positively prepared as required by Paragraph 16, whilst the policies for Burntwood are not clearly written and are ambiguous. The proposed strategy provides no certainty for achieving sustainable development at Burntwood and does not seek to meet the future needs for social and economic growth of the town. This Local Plan provides the opportunity to identify a future growth strategy that would address local affordable housing needs and job growth, with the backdrop of very special circumstance to justify the Green Belt release relating to local and cross boundary housing needs. In order for the plan to deliver a sustainable strategy of growth, expansion of Burntwood must be identified. The relationship of Burntwood to Birmingham and wider Housing Market Area has not informed the Council's strategy for the settlement and moves away from the plan-making framework advanced through the NPPF.</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.
LP2040 257	Katherine Else (Claremont Planning) on behalf of the Harworth Group (Claire Biddle)	Local Policy H2	Yes	Yes	No	Yes	Yes	<p>Objects to local Policy H2 as currently drafted. In particular objection is raised to the identification of individual viability assessments for affordable housing delivery being required for strategic sites over 500 dwellings. It is considered that this should not be a requirement in every case and especially where developments can meet the target threshold of 20% affordable housing provision. The requirement for a viability assessment places too much onus on developers and it is recommended that only in circumstances where the 20% threshold cannot be met should viability assessments be required.</p> <p>The current approach to dealing with affordable housing thresholds on strategic sites over 500 dwellings is not effective and will lead to delays and unnecessary costs to the developer in providing viability assessments that may not be required. This policy as currently drafted does not accord with NPPF it is not clearly written and is ambiguous.</p>	No changes required.	Policy seeks to ensure the maximum level of affordable housing is achieved whilst ensuring viable development. Affordable housing requirements supported by evidence within the HEDNA.
LP2040 258	Katherine Else (Claremont Planning) on behalf of the Harworth Group (Claire Biddle)	Policy INF5	Yes	Yes	Yes	Unanswered	Unanswered	<p>Supports the wording of this policy. In particular, the fact that development proposals, including strategic sites allocated within the Plan, should incorporate the required amount of open space. Support is given to the identification that the Council will negotiate on a site-by site basis the type of open space provision where other typologies may be more appropriate or desirable. It is considered that the wording of this policy applies a flexible approach to open space provision.</p>	No changes required.	Support noted.
LP2040 259	Katherine Else (Claremont Planning) on behalf of the Harworth Group (Claire Biddle)	Policy SHA1	Yes	Yes	No	Yes	Yes	<p>There is a concern about the site's deliverability and viability, particularly given the large-scale infrastructure improvements that will be required to deliver this site, concern is raised in regard to this proposed allocation as its represents a significant proportion of the District's future housing delivery across the plan period. In addition, 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.</p> <p>As currently drafted, the Plan does not contribute to the achievement of sustainable development, whilst insufficient sites are proposed for allocation. It is considered that in order to ensure that the Plan proposes a wholly sustainable strategy for development, additional allocations should be identified at Burntwood. The town represents one of the most sustainable locations within the District, and benefits from existing infrastructure that could support additional growth.</p>	No changes required.	Site is considered to be deliverable. Housing trajectory within Local Plan 2040 takes a cautious approach in respect of delivery of the site.

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LP2040 260	Katherine Else (Claremont Planning) on behalf of the Harworth Group (Claire Biddle)	Strategic Policy 1	Yes	Yes	No	Yes	Yes	<p>Supports the identification of the Council's aim to achieve sustainable development in delivering its housing and employment land requirements. Concern is raised however that the proposed housing requirements set out in Policy SP1 do not provide sufficient levels in the right locations to meet the needs identified from the wider Greater Birmingham and Black County housing market area identified and does not go far enough in addressing the lack of affordable housing across the District. It is considered that the Local Plan should identify appropriate strategic locations for additional housing within Burntwood given its position in the settlement hierarchy as the second largest settlement in the District and the sustainability credentials afforded to it. The Council have identified that strategic changes will be made to the Green Belt around Fazeley, Mile Oak &amp; Bonehill and Whittington to meet strategic development needs. It has not however identified strategic changes around Burntwood to meet strategic development needs and objection is raised in respect of this approach as the plan has not been positively prepared.</p> <p>It is considered that the site off Hospital Road, Burntwood provides an excellent opportunity to meet the future housing needs of the District. Initial proposals for the site have been drawn up for a development of around 1,300 homes including affordable housing and housing for older people with primary school/local amenities, public open space, pedestrian and cycle links and landscaping. Technical considerations have been addressed and there are no fundamental obstacles to the delivery of the site.</p> <p>The plan as currently drafted does not include any allocations at Burntwood or provide for any future delivery of safeguarded land, despite it being the second most sustainable settlement in the District, as confirmed by its position in the settlement hierarchy. As a result, the spatial strategy proposed in the Plan is not the most appropriate and will be ineffective, as it does not propose any site delivery at the town that is not already consented. The provision of major development at Burntwood requires a review of the settlement boundary to ensure that largescale development and infrastructure provision can satisfy housing, community and employment demands over the plan period and beyond. Instead, the strategy advanced through the plan justifies green belt release and delivery of major development at less sustainable locations within the District.</p> <p>Through the plan preparation process the Council has not undertaken a 'policy off' approach to direct growth and investment at the most suitable and sustainable locations, as well as those areas that are in need of the economic investment that development provides. It is apparent that Burntwood is such a destination where its proximity to Lichfield and Birmingham, as well as its inherent need for economic promotion and investment, should capitalise upon development delivery through this Local Plan. However, it is evident that the opportunities to deliver allocations at Burntwood and expand the settlement has been resisted politically and this has directly informed the spatial strategy / distribution of development rather than the appropriateness of locations to received growth. This approach undermines the evidence base presented and discredits the</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.
LP2040 261	Katherine Else (Claremont Planning) on behalf of the Harworth Group (Claire Biddle)	Strategic Policy 12	Yes	Yes	No	Yes	Yes	<p>Objects to the omission within Policy SP12 of the site at Land off Hospital Road, Burntwood as a strategic housing allocation with an approximate number of 1,300 new homes. It is considered that as currently drafted this policy does not allocate to the right locations and this will result in an unsustainable pattern of growth for the District. In respect of land to the north-east of Lichfield for 3,300 dwellings there is a concern about the site's deliverability and viability, particularly given the large-scale infrastructure improvements that will be required to deliver this site, concern is raised in regard to this proposed allocation as its represents a significant proportion of the District's future housing delivery across the plan period.</p> <p>No strategic development sites are identified at Burntwood and objection is raised to the omission of Burntwood as a location for strategic development. This is particularly the case given its place in the settlement hierarchy as a second-tier settlement and sustainability credentials afforded to it. The site at Hospital Road, Burntwood offers an excellent opportunity to provide residential development in a sustainable location to assist in ensuring that the Plan is capable of meeting the District's housing requirement in full.</p> <p>The plan as currently drafted does not include any allocations at Burntwood, despite it being one of the most sustainable settlements in the District as confirmed by its position in the settlement hierarchy. As a result, the spatial strategy proposed in the Plan is not the most appropriate, as it does not propose large-scale development at Burntwood and instead proposes large-scale development at less sustainable locations within the District. Promoting growth at less sustainable locations such as this is likely to result in unsustainable patterns of growth, including travel patterns for future residents. This is highlighted in the Sustainability Appraisal, which recognises that development at Hospital Road Burntwood would score more favourably in respect of encouraging the use of existing or provide sustainable modes of travel, than the sites allocated at Fazeley, Fradley and Whittington.</p> <p>It is considered that there are very likely to be issues with deliverability of the housing allocations identified in the Plan as currently proposed that could have significant implications for housing delivery within the plan period. Concerns in regard to Land to the North-East of Lichfield, which is proposed to be allocated for 3,300 dwellings, a large proportion of the proposed housing in the emerging Plan. These concerns relate to the infrastructure improvements that will be required to deliver the site, whilst it is also that the concentration of housing in this part of the district, close to existing development sites at Streethay and Watery Lane will have implications for infrastructure and patterns of sustainable development, as well as potential issues with market saturation.</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.
LP2040 262	Katherine Else (Claremont Planning) on behalf of the Harworth Group (Claire Biddle)	Strategic Policy 11	Yes	Yes	No	Yes	Yes	<p>As currently drafted, the Plan does not contribute to the achievement of sustainable development, whilst insufficient sites are proposed for</p> <p>Support the identification within Policy SP11 that through the plan making process of developing this plan, a strategic need to make changes to the Green Belt boundary to accommodate growth requirements of the district has been identified. Objection is raised however to the omission of Burntwood as a location where the Green Belt boundary has been amended to accommodate strategic growth. It is considered that the green belt boundary should be amended to accommodate land off Hospital Road, Burntwood for development given its close relationship to the town, capacity for development lack of harm to the purposes of including land in the Green Belt.</p> <p>No justification has been given as to why there are no Green Belt boundary changes proposed at Burntwood. Previous versions of the plan proposed sizeable strategic allocations to the settlement that required a Green Belt review of the settlement boundary. Although objection was raised to the site release that had been identified by the Council, the principle of expansion of the town was supported.</p> <p>The plan as currently drafted is not effective because it will not ensure that Green Belt boundaries will not be needed to be altered to address a sustainable approach to development.</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.
LP2040 263	Katherine Else (Claremont Planning) on behalf of the Harworth Group (Claire Biddle)	Sustainability Appraisal	Yes	No	Yes	Yes	Yes	<p>Section 19 of Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out a Sustainability Appraisal, whilst Section 39 of the same Act requires that the authority must do so with the objective of contributing to the achievement of sustainable development. It is considered that the Sustainability Appraisal provided by the Council, does not comply with those requirements. In particular, Section 4.3 relating to the Preferred Allocations, details the site selection process that has been undertaken.</p> <p>Whilst it is acknowledged that the findings of the Sustainability Appraisal are not the only consideration that is taken into account when determining the options or housing allocations taken forward in a plan, the findings of the SA were a consideration. The SA fails to provide a detailed explanation of the scoring process for the sites that were assessed, and as a result it is not clear how the Council has assessed the sites and accordingly identified the sites that were allocated in the Plan.</p>	No changes required.	Local Plan 2040 has been supported by evidence including Sustainability Appraisal at all stagers of plan progression. Lichfield District Council considers the Sustainability Appraisal to have been prepared in accordance with relevant regulations and guidance.

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LP2040 264	Katherine Else (Claremont Planning) on behalf of the Harworth Group (Claire Biddle)	Table 7	Yes	Yes	No	Yes	Yes	<p>Objects to Table 7 in the emerging Local Plan, in respect of the failure to allocate development at Burntwood and in particular that the promoted Land at Hospital Road has not been identified as an allocation for Green Belt release. The proposed allocations in the Plan are not considered to represent sufficient opportunities to ensure that the Plan is able to deliver the housing requirement, or ensure that development in the District is delivered in the most sustainable locations in an appropriate spatial distribution. In particular, this includes the settlement of Burntwood, which is in the second tier of the settlement hierarchy and therefore represents a highly sustainable location for growth, however is only anticipated to deliver development at committed sites through this Plan. As such, the Council has failed to recognise the opportunities to deliver large-scale sustainable development at Burntwood, in particular on Land off Hospital Road, which could contribute to ensuring that the Plan is able to fulfil the housing requirement for the District and deliver sustainable patterns of growth.</p> <p>The proposed housing allocations identified in Table 7 and the associated Policy SP12, include one significant allocation at Lichfield City, whilst the other three allocations are proposed at Fazeley, Fradley and Whittington. These settlements are all identified in the Settlement Hierarchy in Table 4 of the Plan as Level 3 Settlements – Larger Service Villages. This is a lower tier than Burntwood, establishing that those settlements are less sustainable, and less appropriate to accommodate significant levels of growth than Burntwood which is one of the main centres identified within the District. It is not considered that the Plan is justified as currently drafted, as it does not represent the most sustainable and appropriate strategy when taking into account reasonable alternative that have been promoted through the plan process, such as Land off Hospital Road, Burntwood.</p> <p>The Plan as currently drafted, is reliant on a small number of large strategic allocations, which raises concerns in respect of deliverability and ensuring that the Plan is able to meet the District's housing needs across the Plan period. This is particularly the case in respect of Land to the North East of Lichfield, which is expected to deliver the majority of the growth proposed to be allocated through this Plan. The scale of this proposed allocation and the resulting requirements for infrastructure raises potential issues surrounding viability and the capacity of the market to accommodate such large scale development in a part of the District where substantial allocations have already been permitted.</p> <p>The housing delivery set out in Table 7 demonstrates that the Plan as currently drafted is not based on a strategy that will lead to sustainable patterns of development in the District. In particular the Plan does not propose to allocate any strategic housing developments to the second tier settlement of Burntwood, and instead proposes to allocate significant amounts of development to third tier settlements of Fazeley, Fradley &amp; Whittington. This is despite the promotion of sustainable sites at Burntwood, in particular Land off Hospital Road, through the previous stages of the preparation of the Plan, which would deliver growth at the District's most sustainable settlement after the strategic centre of Lichfield.</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.
LP2040 265	Sam Lake (Turley) on behalf of Taylor Wimpey	SP1	No	No	No	Yes	Yes	<p>The spatial strategy is not appropriate in its uneven distribution across the higher tier settlements and is not based on the evidence prepared by the District Council, including the Settlement Sustainability Study (September 2020). Therefore, the spatial strategy is not justified in the context of paragraph 35a of the NPPF.</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.
LP2040 266	Sam Lake (Turley) on behalf of Taylor Wimpey	SHA1	No	No	No	n/a	Yes	<p>The housing trajectory for SHA1 is not realistic. A proportionate approach to the scale and distribution should be incorporated which reduces the over-reliance on the housing trajectory of SHA1.</p>	No changes required.	Housing trajectory within Local Plan 2040 takes a cautious approach in respect of delivery of the site.
LP2040 267	Sam Lake (Turley) on behalf of Taylor Wimpey	SHA2	No	No	No	n/a	Yes	<p>SHA2 is not deliverable and will not contribute to a sustainable pattern of growth.</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered.
LP2040 268	Sam Lake (Turley) on behalf of Taylor Wimpey	SHA3	No	No	No	n/a	Yes	<p>SHA3 is not deliverable and Fradley performs poorly in sustainability terms.</p>	No changes required.	Site is considered to be deliverable. Housing trajectory within Local Plan 2040 takes a cautious approach in respect of delivery of the site.
LP2040 269	Sam Lake (Turley) on behalf of Taylor Wimpey	SP12	No	No	No	Yes	Yes	<p>There is a greater local housing need in the district beyond the minimum generated by the standard method. The current publication plan is not making a proportionate contribution to the unmet needs from the GBBCHMA. The distribution of housing growth does reflect the sustainability of existing settlements in the district.</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.
LP2040 270	Sam Lake (Turley) on behalf of Taylor Wimpey	H2	No	No	No	n/a	Yes	<p>The scale and distribution of affordable housing is not based on the full plan period and other costs associated with testing viability (e.g. infrastructure). There is a greater local housing need in the district beyond the minimum generated by the standard method.</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.
LP2040 271	Sam Lake (Turley) on behalf of Taylor Wimpey	AH2	No	No	No	Yes	Yes	<p>A higher scale of housing growth should be distributed to Armitage with Handsacre to sustain the viability of community services and facilities in the settlement over the plan period.</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.
LP2040 272	Anne Denby Canal and River Trust	Whole Document	Unanswered	Unanswered	unanswered	Unanswered	Unanswered	<p>The trust previously advised that reference to the canal and river trust should be included within the landscape and ecology profile. However the para previously numbered 5.37 now appears to have been deleted in its entirety. This should be reinstated with the inclusion of the reference to the trust .</p>	No changes required.	No changes required.
LP2040 273	Anne Denby Canal and River Trust	SP10	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	<p>The pollution of trust waterways from the development of adjacent land or the creation of land instability through development in close proximity to our infrastructure are both matters relevant to the trust as statutory consultee. The trust supports how this policy seeks to prevent pollution occurring as a result of proposed developments.</p>	No changes required.	Support noted.
LP2040 274	Anne Denby Canal and River Trust	SD2	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	<p>The Trusts waterways can be used to generate low carbon energy from hydropower to generate electricity or heat pumps using canal water to heat and cool buildings. The national policy driver which supports this opportunity is the 2050 zero carbon target and the government incentives such as the FIT and RHI.</p> <p>Policy SD2 would be more effective and consistent with the aims of the NPPF if it included clearer references to the potential of the canal network and encompassed the progressive nature of policies, we have seen elsewhere in the country which will deliver the low carbon outcomes sought.</p>	No changes required.	No changes required.

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LP2040 275	Mr & Mrs Noonan	Whole document	No	No	No	Yes	No	District Council has not worked with local councils and the local community on selecting SHA2. Council have ignored hundreds of objections raised by local residents in 2019/20. Not considered the impact on the environment, local schools, roads, increased traffic, loss of Green Belt and ongoing issues raised by the community. Evidence is not complete including transport assessment. Green Belt Review has not been interpreted correctly. Location of SHA2 does not meet several objectives set to in the sustainability appraisal. Brownfield sites should be considered first. Objections raised to consultations have been ignored. Council have not considered alternatives and site should not be selected until all evidence gathered. Impact on infrastructure.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.
LP2040 276	Anne Denby Canal and River Trust	SP2	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	The 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 Towpath Design Guide should be considered. The trust would like to be named as a partner to help the council to achieve the sustainable aims and the following sentence should be added to the supporting text: "Investment in the Canal & River Trust towpaths and access points will improve these existing sustainable pedestrian/cycle routes and assist those living and working close to the canal network in achieving more active commuting and leisure time choices."  Addition of this to supporting text: "Investment in the Canal & River Trust waterways will improve the existing network and assist those living and working close to the canal network in achieving more active and healthy lifestyles."	No changes required.	No changes required.
LP2040 277	Anne Denby Canal and River Trust	SP3	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	Sustainable travel choices are not just provided by the highway 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. Most of the bridges are within the trust ownership. Developments that place a direct and increased vehicular use on historic canal bridges should be considering how they will protect the structure from inappropriate loads and bridge strikes whilst putting in place mechanisms to manage the increased vehicle movements. The wording within the final bullet point of the policy also remains unclear 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 the 3rd party infrastructure.	No changes required.	No changes required.
LP2040 278	David Martin	Policy SHA2	No	No	No	Yes	No	The Council have not worked with Tamworth Borough Council, Fazeley Council or the local community to select SHA2. The Council have ignored hundreds of objections. Plan does not comply with national policy in respect of protecting Green Belt land. Traffic is already beyond the capabilities of Mile Oak junction. New housing should be built on brownfield sites. Council have not properly considered reasonable alternatives when selecting SHA2. Evidence should have been gathered such as traffic assessment. Local Plan is not effective as the infrastructure requirements have not been fully considered.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.
LP2040 279	Anne Denby Canal and River Trust	SP6	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	The canal provides opportunities on the doorstep for personal health and wellbeing improvement. The document does not make reference to the availability of canals for different types of recreation the canal and river trust are not mentioned as a facilitator, influencer or deliverer.	No changes required.	Local Plan notes the importance of the canal network in respect of health and well being.
LP2040 280	Anne Denby Canal and River Trust	NR4	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	The trust consider that they should be added to the list of initiatives that address evidenced connectivity strain through biodiversity offsetting and recovery mapping paragraph 4 of this policy.	No changes required.	No changes required.
LP2040 281	Anne Denby Canal and River Trust	SP17	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	Significant parts of the canal networks infrastructure and assets are not within a conservation area or listed structures. A significant part of the canal network within Lichfield District therefore provides non-designated heritage assets to the locality. SP17 does not refer to the canal network as a non-designated heritage asset. The trust consider that the listed of heritage assets in LDC should be updated as per the following: locally listed buildings and other non-designated locally significant assets, such as the canal network. This could be further strengthening with clarity on the historic environment being provided within the glossary.	No changes required.	No changes required.
LP2040 282	Anne Denby Canal and River Trust	AH1	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	The trust however wish to be named as a partner in the delivery of Local Policy AH1 to reinforce Strategic Policy 2 to better facilitate dialogue on proposals. The trusts towpath design guide is relevant to proposals on our network.	No changes required.	No changes required.
LP2040 283	Anne Denby Canal and River Trust	F2	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	The trust wish to confirm that we support this aim and also wish to be partners in the drafting of any proposed enhancements to our network.	No changes required.	No changes required.
LP2040 284	Anne Denby Canal and River Trust	SHA3	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	The canal environment has much to offer to the vision of the strategic housing allocation at Fradley and SHA3 would be more effective in taking this vision forwards in the design masterplan by adding a paragraph to specifically address the design issues relating to the canal environment.  Bridge 50, Bridge 91 are heritage assets and their structures are narrow only permitting traffic in one direction at a time, providing no separate pedestrian walkway and with limited visibility on approach due to their humped nature. The trust wish these heritage assets to be protected and retained with suitable mitigation put in place as well as studies to see if the bridge structures can accommodate the additional use.	No changes required.	No changes required.
LP2040 285	Anne Denby Canal and River Trust	FR1	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	The canal network is a key characteristic of Fradley, the policy states that new developments should provide connections to the canal, improve towpaths and maximise the opportunities for active frontages enabling the canal to become an active travel route through the settlement. The trust supports this aim but reiterates the relevance of the trusts towpath design guide to proposals on our network. As above the trust therefore wish to be named as a partner in the explanatory para 15.48. The following wording is suggested: ".....active travel route would help to relieve congestion on the surrounding roads during school drop off times. Working in partnership with the Canal & River Trust to provide initiatives to protect and enhance the canal environment and improve the towpath surfacing and access points will therefore be supported and encouraged. Particular care....."	No changes required.	No changes required.



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LP2040 286	Anne Denby Canal and River Trust	SHA4	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	<p>The trust considers that both on and off site considerations regarding the canal network and its infrastructure. the proposed allocation of the site needs to consider the impact that construction traffic and predicted traffic generation would have on the safety for users and the structural implications for historic canal bridges in the vicinity of this allocation. Bridge 80 and 82 are historic assets and the structures are narrow, only permitting traffic in one direction at a time, providing no separate pedestrian walkway and with limited visibility on approach due to their humped nature/corners/junctions. The trust consider that these issues should be considered within this plans evidence base in allocating this site. The trust wish these heritage assets to be protected and retained with suitable mitigation put in place which would be informed through appropriate study as part of the strategic housing allocation masterplan. An appropriate study should include an assessment of the existing bridge structures and their ability to accommodate the additional use proposed. The trust advise that the second paragraph of SHA4 should be altered to: 'the will be a requirement for the development site to be of the highest quality and accommodate the correct infrastructure provision/improvement, both on and off site, in the right places.'</p> <p>and within the Infrastructure section of the Policy the first bullet point should be amended to:</p> <p>"Provision for access to and improvement of the strategic and local highway network and infrastructure as appropriate"</p>	No changes required.	<a href="#">No changes required.</a>
LP2040 287	Anne Denby Canal and River Trust	H2	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	<p>The canal network is a key characteristic of Hopwas and its Conservation Area. As above the Trust therefore wish to be named as a partner in the explanatory paragraph 15.10. The following wording is suggested: ".....surrounding roads during school drop off times. Working in partnership with the Canal &amp; River Trust to provide initiatives to protect and enhance the canal environment and improve the towpath surfacing and access points will therefore be supported and encouraged."</p>	No changes required.	<a href="#">No changes required.</a>
LP2040 288	Katie Lowe	SHA2	No	No	No	Yes	No	<p>The council has not worked with TBC and Fazeley Town Council or the community to select SHA2. The council have ignored the hundreds of objections to SHA2 raised by the local community.</p> <p>The plan does not comply with NPPF on protecting Green Belt land, important evidence such as traffic assessments at Mile Oak are missing and the results of the 2019 Green Belt Review have not been interpreted correctly. Allocation of SHA2 does not meet several strategic objectives and priorities set out in sustainability appraisal. The council has not consulted properly with the local community or considered the impact of the development on Tamworth residents.</p> <p>Brownfield and sites not in the greenbelt should be chosen before SHA2 that is in greenbelt countryside and is not in a sustainable location.</p> <p>the council have not properly considered all reasonable alternatives to SHA2 which is in the greenbelt, SHA2 should not have been selected before gathering evidence on traffic assessments, impact on local infrastructure, high school places.</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered.
LP2040 289	Raymond Hateley	SHA2	No	No	No	Yes	No	<p><del>The local plan is not consistent with the NPPS sections 2, section 5, section 8, section 13, section 14, section 15</del></p> <p>The council has not worked with TBC and Fazeley Town Council or the community to select SHA2. The council have ignored the hundreds of objections to SHA2 raised by the local community. The plan does not comply with NPPF on protecting Green Belt land, lack of highways evidence. The council have not properly considered all reasonable alternatives to SHA2 which is in the greenbelt, SHA2 should not have been selected before gathering evidence on traffic assessments, impact on local infrastructure, high school places. The local plan is not consistent with the NPPS sections 2, section 5, section 8, section 13, section 14, section 15.</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate.
LP2040 290	Christopher Jackson	SHA2	No	no	no	Yes	no	<p>There has been no compliance with the duty to cooperate as Lichfield District Council has not worked either Tamworth Borough Council or Fazeley Town Council in selecting the site at the preferred options stage. Residents have been ignored at consultation 2019/2020.</p> <p>The plan is not compliant with the NPPF on protecting Green Belt Land, the local community has not been consulted or considering regarding the impact of SHA2.</p> <p>brownfield should be considered before greenbelt alternatives. Thorough evidence should be gathered regarding traffic and impact on local infrastructure.</p> <p>The impact on local area has been disregarded.</p> <p>The plan does not comply with NPPF policy, sections 13, sections 14, and sections 15.</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate.
LP2040 291	Christopher Goodhall	SHA2	No	no	no	Yes	no	<p>This plan cannot justify the impact to rural environment, green belt protection. SHA2 not effective for anything within the plan other nearby sites should have been taken up before a green belt boundary change.</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate.
LP2040 292	Stephen Hateley	SHA2	No	No	No	Yes	No	<p>The council have not worked with TBC and Fazeley Town Council. The council have ignored objections from public.</p> <p>The plan does not comply with NPPF on protecting Green Belt Land, traffic assessments missing, SHA2 does not meet several strategic objective priorities, the council has not consulted with local community or considered impact on Tamworth's residents.</p> <p>The council has not gathered evidence on traffic assessment, local infrastructure, high school places, SHA2.</p> <p>The local plan is not consistent with section 2, section 5, section 8, section 13, section 14, section 15.</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate.
LP2040 293	Margery Hateley	SHA2	No	No	No	Yes	No	<p>Lichfield District Council have not worked with local councils or local communities to select SHA2. Council has ignored hundreds of objections to SHA2 in 2019/20. Plan does not comply with the NPPF on protecting green belt land as SHA2 is within the green</p> <p>The plan does not comply with national planning policy on 'protecting green belt land' as site SHA2 is in the greenbelt. the local plan is unsound as the exceptional reasons to justify 800 homes in this location in the green belt are not set out in the local plan.</p> <p>Brownfield sites and sites not in the greenbelt should be chosen before SHA2.</p> <p>traffic assessments, local infrastructure, impact of new developments, need for high school places has not been considered.</p> <p>LP not consistent with section 2, section 5, section 8, section 13, section 14, section 15.</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate.

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LP2040 294	Sheila Lee	SHA2	Unanswered	Unanswered	Unanswered	Yes	Unanswered	<p>objections ignored</p> <p>Green belt should mean green belt.</p> <p>Other brownfield sites should be considered first.</p> <p>Traffic is already bad especially Drayton manor traffic, the area is not suitable for 800 houses</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate.
LP2040 295	Burntwood Action , Vic Chamberlain	Whole Document	Unanswered	Unanswered	unanswered	Unanswered	Unanswered	<p>Burntwood Action Group support the amended Local Plan, particularly with regard to the sections relating to Burntwood.</p> <p>However there are the following concerns:</p> <ul style="list-style-type: none"> <li>- it is essential that during the plan period that all the remaining areas of Burntwood's Greenbelt are retained and that future considerations do not revert any of these safeguarded land.</li> <li>- the previous assurances from LDC that all built and planned 'windfall houses' [circa 200]are currently recorded and contribute to Burntwood's housing allocation over the period of the plan.</li> <li>- the previous long overdue Burntwood area action plan is acted on swiftly and that adequate funding is made available to facilitate a robust plan, including the employment of consultants and compulsory purchases where necessary. This should enable Burntwood's infrastructure to match requirements of its current population.</li> </ul>	No changes required.	Support noted. The Local Plan 2040 does not propose areas of safeguarded land. 'Windfall' developments are counted towards housing deliver as demonstrated within evidence including the Five Year Housing Land Supply and Strategic Housing Land Availability Assessment. Local Plan 2040 sets out that an area action plan for Burntwood will be progressed following the adoption of the Local Plan 2040.
LP2040 296	Hilary Hodgkins	SHA2	No	No	no	yes	no	<p>LDC have not held public consultations with local residents at Mile Oak or Fazeley to give them a chance to voice their concerns.</p> <p>The plan does not comply with NPPF policy on protecting green belt land. Traffic assessments have not been properly carried out., thought must be given to local and Tamworth residents. difficulties for people wanting to use Robert peel hospital, children using transport to local schools, people trying to get to work or appointments on time.</p> <p>LDC have not considered that it would make more sense to build on more urban sites near to the railway and bus stations rather than where extra traffic would add pollution and traffic congestion on roads not suitable to carry more traffic. no dedicated cycle ways in this area either.</p> <p>there is no library, proper doctor surgery, no public car park for people using local amenities. the bus route only goes to Tamworth to Birmingham.</p> <p>traffic already a great issue in area with tail backs and delays on roads which can cause issues for emergency services.</p> <p>Mile Oak does not need to become a built up area. the area should be improved to benefit wildlife instead of destroying greenbelt.</p> <p>Even if there were plans for expansion of the Robert Peel Hospital this would not take place as it has been built in Green Belt.</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate.
LP2040 297	Kevin Priestley	SHA2	No	Yes	No	Unanswered	Unanswered	<p>Infrastructure doesn't seem to be mentioned in this document. Without new infrastructure there will be chaos in and around Tamworth. If LDC want to build more houses then do it nearer Lichfield not here in Tamworth.</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate.
LP2040 298	Maureen Poyner	SHA2	No	No	No	Yes	no	<p>not worked with local community or other residents of Fazeley.</p> <p>No justification of 800 houses on green belt. Traffic congestion at Mile Oak.</p> <p>Do not build on green field site.</p> <p>The development will impact on schools, doctors, traffic will worsen, already been impacted with recent development.</p> <p>there will be air pollution from traffic.</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate.
LP2040 299	Mr Alan and Mrs Maureen Tonks	SHA2	Unanswered	no	no	yes	no	<p>with council offices closed it is hard to access everything specifically for the elderly.</p> <p>The forms are hard to understand for the layman or someone without planning knowledge.</p> <p>The local plan admits that there is insufficient facilities within the District and that people of the District must access facilities in another area, namely Tamworth which already suffers from over crowding.</p> <p>No extra facilities are provided for medical needs, or education and it does not address the parking or overcrowding which already exists in Fazeley.</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate.
LP2040 300	Paul Stevenson	Whole document	No	No	No	No	No	No comment provided.	No changes required.	Not applicable.
LP2040 301	Linda Sproston	unanswered	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	<p>Fazeley, Mile Oak and Bonehill are referred to as 'a rural settlement and as such should be allowed to grow through small incremental developments'. This is being achieved by the use of brown field sites. The proposal to build 800 houses represent a 40% increase in the size of this rural settlement seems at odds with the vision. Green belt should be protected to ensure that it does not merge into the west midlands conurbation. Building such a large development on a shrinking green space will not serve the existing community. According to the sustainability report that is a need for smaller properties in this area. this is disagreed with. there is a wide variety of housing available in a variety of price bands from terraced and villa type housing to considerable detached properties. Tamworth borough council has raised concerns over the impact this development would have on the infrastructure and services of the town. Lichfield Council already have plans to build a large development of 1000 houses at Arkall Farm, Ashby Road abutting the boundary with Tamworth. The further development in this area would seriously impact on the services, amenities and infrastructure of Tamworth. The local plan only proposes to build only one primary school.</p> <p>The capacity at the doctors surgery is limited as it is a part time Doctors surgery and is a satellite of Tamworth's medical practice., the hospital at Mile Oak is constantly fighting battle against closure. There are no law courts or a policy station open during restricted hours. There is a serious lack of health care and educational facilities in this area. 1500 dwellings would have a severe impact on the highway network, especially considering the close proximity to Birmingham and Tamworth's relationship to it with a large part of the population working in the city. At certain time sit is virtually impossible to access and egress properties on the Sutton Road and adjoining Avenues. Apparently the proposed local plan and spatial policy and delivery report should take into account the effect on amenities of the area and protect public interest. the population is reliant on seeking services and infrastructure in neighbouring areas. There is no direct transport from Fazeley/Mile Oak/Bonehill and residents are reduced to either driving or taking a four hour round trip bus journey to access any service in Lichfield. At a time when we are fighting a pandemic we should be seeking to allow more open spaces not crowding more people together. The newly built properties along cotton Lane, Tamworth ha a very small footprint.</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate.



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LP2040 302	Julie Walker	SHA2	no	No	No	Yes	No	LDC have not communicated with local councils or local community reference housing allocation at Mile Oak. Many objections have been ignored.  NPPF on protecting Green Belt land has not been adhered to. Results of Green Belt review 2019 have not been interpreted correctly. The council has not considered the impact on local community and Tamworth's residents.  Brownfield sites should be chosen before Green Belt. Council have not considered other reasonable alternatives.  Traffic is a serious issue in the area from Mile Oak to Ventura Park. Primary and high schools are already full.  SHA2 is not effective nor deliverable over plan period due to infrastructure requirements and implications.  NPPF is not consistent with: national planning policy: sections 2, sections 5, sections 8, sections 13, sections 14, sections 15.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate.
LP2040 303	Shelley Holroyd	SHA2	no	no	no	yes	no	The council have ignored the vase number of objections raised by the local community.  The plan does not comply with NPPF policy on protecting green belt land. There is no sound justification for 800 houses to be built in this location. The council has not properly consulted local communities regarding the impact of development.  there are other alternative brownfield sites that could be chosen for this development.  there has been insufficient focus placed on the impact to the land community such as traffic and limited availability at existing schools.  SHA2 is in the greenbelt which is contrary to NPPF. SHAW would not enhance the natural environment, it will remove valuable countryside.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate.
LP2040 304	Jacqueline Gould	SHA2	no	no	no	yes	no	The council have not worked with TBC and Fazeley Town Council or the local community to select SHA2. objections from the community have been ignored.  The plan does not comply with NPPF policy on protecting green belt as SHA2 is in the green belt. Local plan is unsound as exceptional reasons to justify 800 homes in the location are not set out in the local plan. traffic assessments are missing and results of 2019 green belt review not interpreted correctly, Allocation of SHA2 does not meet several objectives and priorities set out in the sustainability appraisal.  The council has not consulted properly with local community or considered impact on Tamworth residents.  Brownfield and sites not in greenbelt should be chosen before SHA2 that is in greenbelt countryside and is not in a suitable or sustainable location. The council have not properly considered all reasonable alternatives to SHA2 which is in the greenbelt.  Further evidence gathering is required for traffic assessments, impact on local infrastructure, high school places. SHA2 is too big when compared to the size to the existing ward.  the local plan is not effective or deliverable over the plan period as the infrastructure requirements and implications of SHA2 have not been fully considered.  The local plan and allocation of SHA2 is not consistent with the following sections in the NPPF: Section 2, Section 5, Section 8, Section 13, Section 1, Section 15.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate.
LP2040 305	Anthony and Christine Hinks	SHA2	no	no	no	Unanswered	no	These proposed houses are totally wrong for this area. It will cause congestion on the roads which are not big enough now. There will not be enough room in local schools and even a new one is built it will be insufficient.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate.
LP2040 306	Janet Burton	SHA2	no	no	no	Unanswered	no	No one has asked any of my local residents what we think. I fail to see how a meeting in an afternoon was of any help to younger people who may have objection to the plans they would be at work.  How can a traffic assessment on the Sutton road in the middle of a pandemic be suitable? 800 extra houses could amount to more than 1500 extra cars on the Sutton road alone. Getting out of George Avenue is a nightmare at any time of the day normally.  Most children in the avenue go to Rowlett's high school which is already at capacity - so where are the new children going to go.  we don't have the infrastructure for the number of houses proposed especially with other developments planned for the area including HS2.  There will be too much traffic on the Sutton Rd and not enough schools, doctors, dentists. etc.  Developing SHA2 will destroy the only piece of green space locals have access to.  This is the worst form I have ever had to fill in and I think you have done it on purpose so people won't bother.	No changes required.	Involvement. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.
LP2040 307	Sandra Evans	SHA4	no	no	no	yes	no	Going to the meeting at Whittington Village Hall it was a complete waste of time. No answers given to questions. If this plan was properly prepared then the consideration of 70 houses would putting 70 houses in back lane is going to create even bigger traffic problems. We are already dealing with HS2 and all the disruption from this. Back lane is like a rabbit run day and night.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA4 is supported by a concept statement which details the infrastructure which will be required.
LP2040 308	Dianne Weston	SHA2	no	no	no	yes	no	No local expression given to extra housing objections.  Unsure how to comment on legal requirements required for plan.  The local infrastructure cannot deal with the extra housing, not satisfactorily dealt with.  The LP is not justified because Fazeley is overcrowded with great parking problems, this plan seeks to use facilities outside this district in Ventura Park, Tamworth. Ventura Park already gets crowded and there is already on going development in the area. no account has been taken for older pupils, no extra medical facilities and no account of forthcoming elderly population has been addressed.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate.

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LP2040 309	Charlotte Fitzgerald	SHA2	no	no	no	yes	no	<p>LDC haven't worked with Local Community or Council to select strategic Housing Allocation SHA2 at Mile Oak. Hundreds objections have been ignored.</p> <p>Doesn't comply with NPPF on protecting Green Belt land as SHA2 is in greenbelt. Traffic assessment at Mile Oak evidence not complete. Results of 2019 Green Belt review haven't been incorrectly interpreted. the council haven't properly consulted with local community.</p> <p>Brownfield sites and sites not in greenbelt should be chosen before SHA2.</p> <p>The council haven't properly concluded all the reasonable alternatives to SHA2, the impact on primary and school places not considered. SHA2 is too big when compared to the size of the existing Fazeley ward. Allocations in Burntwood comprise of only 4% of homes compared to 29% for smaller settlements (mainly in SHA2) which isn't proportionate.</p> <p>Local plan isn't effective or deliverable over the plan period as implications of SHA2 haven't been fully considered such as traffic on A453 between Sutton and Tamworth.</p> <p>Local Plan is not consistent with NPPF: Section 2, Section 5, Section 13. SHA2 will remove valuable countryside and will have a negative impact on residents heathland well being.</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate.
LP2040 310	David Richards	SHA2	no	no	no	yes	no	<p>minimal cooperation with other affected parties e.g. TBC and Fazeley TC. No evidence of consultation with key service providers e.g. GPs, Schools, local parish council.</p> <p>Plan is counter to NPPF on protecting Green Belt. Results of previous 2019 review have been ignored. LDC ha snot considered overwhelming effect on the local community of Mile Oak.</p> <p>Sites outside the greenbelt have not been considered. Fazeley will no longer be a rural village if the plan goes ahead.</p> <p>Impact on local schools will be too great to assimilate and very few children are likely to travel into Lichfield City for schools. Traffic from 800 extra households will make the already busy A453 &amp; Watling ST impossible to negotiate - a consistent traffic jam. There are already too many accidents at Mile Oak crossroads.</p> <p>SHA2 is completely out of proportionate with a 29% increase to Fazeley and a 4% increase to Burntwood.</p> <p>destroying 130 acres of countryside counter to conservative manifesto saying government would protect green belt and peruse brownfield sites first.</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate.
LP2040 311	Charlotte Fitzgerald	Whole Document	no	no	no	yes	no	<p>LDC not worked with local community or council to select SHA2. hundreds of objections for SHA2 have been ignored by LDC.</p> <p>SHA2 does not comply with NPPF on protecting Green Belt Land. Exceptional circumstances not demonstrated. Traffic assessment not complete. Results of 2019 green belt review haven't been correctly interpreted and site at Mile Oak shouldn't be released from green belt. the council hasn't properly with the local community or considered the impact of the proposed development SHAW2 on the local community or Tamworth residents.</p> <p>Brownfield sites and sites not in the greenbelt should be chosen before SHA2. objection to SHA2 made during the preferred options consultations have been ignored.</p> <p>the impact on local infrastructure will be significant such as on primary and high school places. SHA2 is far room big when compared to other land allocations such as Burntwood with a 4% increased proposed, while Fazeley ward will be 29%.</p> <p>Local plan not effective or deliverable over the plan period as the infrastructure requirements and implications of SHA2 haven't been fully considered such as traffic on the A453.</p> <p>The local plan is not consistent with section 2, section 5, section13. SHA2 will remove valuable countryside and will have a negative impact on residents health and wellbeing.</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate.
LP2040 312	David Richards	SHA2	no	no	no	yes	no	<p>minimal cooperation with other affected parties e.g. TBC and Fazeley TC. No evidence of consultation with key service providers e.g. GPs, Schools, local parish council.</p> <p>Plan is counter to NPPF on protecting Green Belt. Results of previous 2019 results have been ignored. LDC has not considered the overwhelming effect on the local community of mile oak and Fazeley out of all proportion to current population. Sites outside of the green belt have not been considered. Fazeley will no longer be a rural village if plan does ahead.</p> <p>impact on local schools will be great. traffic from extra 800 households will make the already busy A453 and Watling St impossible to negotiate.</p> <p>SHA2 is completely out of proportion to the existing population 29% increase here in Fazeley is disproportionate to 4% for Burntwood.</p> <p>development will destroy 13 acres of countryside- counter to conservative manifesto to protect green belt and purse brownfield.</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate.
LP2040 313	Walton Homes, JVH Planning consultants	SP1	no	no	no	yes	yes	<p>Armitage and Handsacre is a large and sustainable settlement with a full range of facilities and where sites are available to meet the housing requirement and ensure that local housing needs are met in that settlement. The plan makes no provision for safeguarded land to ensure land will be available beyond the plan period to allow for growth.</p> <p>For the larger villages other than Fazeley and Whittington growth is confided to the area within the development boundaries, which are not extended in this plan review. It is considered that the plan is flawed in its reliance on this limited selection of very large development sites. Failure of these sites to come forward early in the plan period will lead to a lack of available land. Furthermore this type of site allocation does not meet the requirements of local and regional house builders who require a range of smaller sites, which can be delivered by that sector, and gives a choice of land and product in the housing market.</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base. Local Plan 2040 proposes four strategic housing allocations. Allocations from the adopted local plan, as set out at Appendix D, will deliver within the plan period and provides significant range of sites in terms of size and location.

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LP2040 314	Walton Homes, JVH Planning consultants	SP12	no	no	no	yes	yes	Table 7 of the plan indicates that the whole strategy relies on four greenbelt sites to deliver the growth to 2040. Table 7 is considered to be unreliable in terms of commitments said to be available. For example the settlement of Armitage Handsacre is said to have a commitment supply of 204 swellings, yet it is known that around 25 plots have been lost to HS2. The table therefore is unreliable and commitments figures may not be relied upon. The text to support the table implies that there is buffer between the required housing numbers and the allocations available. it is not clear if the commitments figure is a real reflection of the situation and in reality there may be little to no buffer available.	No changes required.	Housing supply evidence from the Five Year Housing Land Supply and Strategic Housing Land Availability Assessment supports the Local Plan 2040.
LP2040 315	Walton Homes, JVH Planning consultants	LH1	no	no	no	yes	yes	The sites that are chosen as housing locations will not deliver a balanced housing market. They do not include any smaller scale sites suitable for local/regional house builders. The urban extension sites are historically developed by major housebuilders with their standard product range, as evidenced at Deans Slade Farm, Walsall Road and Streethay developments.	No changes required.	established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base. Local Plan 2040 proposes four strategic housing allocations. Allocations from the adopted local plan, as set out at Appendix D, will deliver within the plan period and provides significant range of sites in terms of size and location.
LP2040 316	Walton Homes, JVH Planning consultants	LH2	no	no	no	yes	yes	Urban extension sites at Fradley, Fazeley and Lichfield north will deliver 20% affordable housing. If this is the case then these sites are the wrong sites to allocate. All of these sites are greenfield sites and it is extraordinary that they should be required to deliver less affordable housing than for example a greenfield site coming forward elsewhere.  HEDNA identifies that there is an affordable housing need of 220 unites per year. which over the plan period is 4,480 units. Given that the affordable housing need equates to 64% of the local authority's local housing need and based on previous completion rates as set out in the authority monitoring report this figure will be challenging to achieve. If this is the case that 64% of the LPA housing is for affordable housing, then it is impossible to understand how the major development locations should satisfy so little of the requirement. If the plan remains are drafted then the affordable housing requirement simply cannot be met. The strategy needs to be altered to ensure that inter alia the affordable housing requirement will be met in full.	No changes required.	Local Plan 2040 includes policy which seeks to deliver the maximum level of affordable housing whilst ensuring development remains viable. This is supported by evidence within the HEDNA and viability evidence.
LP2040 317	Walton Homes, JVH Planning consultants	AH2	no	no	no	yes	yes	We object to inset map No 5. This policy makes no provision for any significant new development in this settlement. On this basis the requirement for affordable homes as set out below will not be met. Land should be made available at Brick Kiln Farm to ensure that sufficient land will be available to meet the housing needs and requirements of this large and sustainable settlement. The plan fails to demonstrate that this community can develop over the plan period and meet the needs for affordable, starter homes and deal with the issue of an ageing population. Housing in Armitage and Handsacre can do this.	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.
LP2040 318	Walton Homes, JVH Planning consultants	SP11	no	no	no	yes	yes	Object to green belt policy, the green belt has been amended at Fazeley and Whittington. The plan has failed to remove land from the green Belt at Brick Kiln Farm Armitage/Handsacre and allow a sustainable development site to come forward. We therefore object to the policy drafted and to the extent of the Green Belt as shown on the proposal map for Armitage/Handsacre at Inset 5. we object to the fact that no safeguarded land is shown as removed from the green belt to allow for the development of settlements in longer term. Land at Brick Kiln Farm should be excluded from the green belt and included within the development boundary. we object to the plan on the basis there is no policy on safeguarded land, to ensure that settlements within the greenbelt can develop in a sustainable manner in the longer term.  The plan fails to include fails to include a policy that would allow development on the edge of smaller settlements in sustainable locations, such a policy should be inserted into the plan to provide for smaller scale sites and achieve flexibility in the plan.	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.
LP2040 319	Richard Robson	SHA3	n/a	n/a	n/a	n/a	n/a	Big concern that the infrastructure will not be there especially the roads, since they are already under strain and there is no intention to upgrade them in the near future. There has been a considerable number of properties built recently between Lichfield and Fradley with no further infrastructure such as roads put in place. Also there have been numerous warehouse development/expansion but no expansion of infrastructure. Roads are too narrow in some areas for HGV's and there is concern on safety. There are only 4 roads covering this area watery lane, Netherstowe lane, wood end lane and eastern avenue. Watery Lane railway bridge is very restrictive and totally unsuitable for all lorries including construction vehicles, cranes and delivery vehicles which are a huge part of modern living. The current speed limit is 60 mph which is unreasonable for a country lane.  Regularly whenever there is a traffic incident anywhere in Lichfield area the whole town and arterial roads come to a grinding halt and this is only going to get worse as current developments around Lichfield comes to completion.  Common Lane is overloaded and Eastern Avenue is meant to be a by-pass. This road has new developments all the way down it and is totally overloaded. It has not recovered from its direct connection to the A38 by-pass.  The A38 often becomes overloaded during business hours, Western and Eastern road are completely over stretched during the same period. Both these roads are single lane roads, Western by pass is the only by-pass in the country to take traffic straight into the town centre. The proposed loop up the Walsall Road to Constitution Island will do nothing since more houses will be built in this location.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Transport evidence is being undertaken
LP2040 320	Geraldine Richards	SHA2	No	No	No	Yes	No	LDC have not taken on board concerns from Tamworth Borough Council or local residents. SHA2 is Green Belt and National Policy is to protect Green Belt. Local Plan does not justify building of 800 homes. Traffic assessments have not been complete - have Staffordshire highways been consulted? 800 homes will add to existing traffic problems. LDC will not have to provide services for new homes as they will look to Tamworth. Does not do anything towards climate change. Loss of biodiversity. SHA2 should be removed. The road system is a triangulation of roads which tends to concentrate the traffic into a very small area.  The road system needs to be sorted now before these new developments come to fruition.  HS2 threatens road closures including the A38 over the whole of this area, there is nowhere for the traffic to be diverted to.	No changes required.	Local Plan 2040 has been subject to three previous rounds of public consultation prior to the regulation 19 consultation. All consultations have been conducted in accordance with the Council's adopted Statement of Community Involvement. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.

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LP2040 321	Phillip Bramwell	SHA2	No	No	No	Yes	No	Lichfield District Council have not worked with local councils or local communities to select SHA2. Council has ignored hundreds of objections to SHA2 in 2019/20. Plan does not comply with the NPPF on protecting green belt land as SHA2 is within the Green Belt, reasons to justify building on the Green Belt are not set out within the Local Plan. The Green Belt Review 2019 has been misinterpreted and the site should remain within the Green Belt. Lack of transport evidence. Brownfield sites and sites not within the Green Belt should be chosen before SHA2. Reasonable alternatives to SHA2 have not been properly considered and site was selected before consideration of some points such as traffic assessments, impact on local infrastructure. SHA2 is disproportionately too big when compared to Fazeley. Not consistent with national policy.	No changes required.	Local Plan 2040 has been subject to three previous rounds of public consultation prior to the regulation 19 consultation. All consultations have been conducted in accordance with the Council's adopted Statement of Community Involvement. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.
LP2040 322	James Bonner (Barton Wilmore) for Rugeley Power Station	SP6	yes	yes	yes	yes	yes	A recognised challenge in the district is meeting strategic housing requirements, including assisting in meeting needs from the wider GBHMA. It is considered that the objective could be worded more positively to ensure consistency with national policy.	No changes required.	Objective is considered to be positively worded.
LP2030 323	James Bonner (Barton Wilmore) for Rugeley Power Station	SP1	yes	Yes	yes	yes	yes	It is noted that for the plan period up to 2040, a contribution of 2,665 dwellings is proposed towards meeting the GBHMA shortfall is to be provided. A capped contribution of 2,000 is to be made for the Black Country Authorities needs starting after 2027 to assist with their identified shortfall up to 2040. The contribution towards unmet needs has reduced since the last preferred options consultation (Nov 2019 - Jan 2020). the local housing need requirement remains broadly the same as previously and we have no specific comments to make on this; our focus is on the contribution towards unmet needs. as a result of the unmet needs contribution reducing, the overall minimum housing requirement has therefore reduced by around 2,000 dwellings from the previously proposed figure of 11,800 dwellings.  The reduction in the contribution is not justified as there does not appear to be supporting explanation or rationale within the current draft plan published evidence base in line with NPPF para 11.  The position statement acknowledges that there will be a shortfall beyond 2031, although this will be quantified once reviews of the Birmingham Development Plan and Black Country Plan are taken into account. We expect it will increase even more significantly given the 35% uplift requirement as part of the new standard method for both Birmingham and Wolverhampton. the evidence base for the draft black country plan around urban capacity indicates a significant expected shortfall. It is considered on this basis that there is not a sufficient contribution in terms of scale of unmet need across the wider GBHMA and the housing requirement should be increased accordingly.	No changes required.	Housing requirement within the Local Plan 2040 provides for the Local Housing Need (LHN) as established by the Standard Methodology and supported by evidence within the HEDNA.  Local Plan 2040 proposes to provide 2665 dwellings to meet unmet needs from the GBBCHMA with 2000 towards the shortfall arising from the Black Country. This is in addition to unmet need provided in the adopted local plan. The 2020 Position Statement identifies that the unmet need arising from the Black Country will emerging from 2027/28. Local Plan 2040 proposes four strategic allocations and includes a significant number of smaller 'saved' allocations from the current local plan which will continue to deliver significant homes to meet the housing requirement to 2040. In respect of the 35% uplift to Local Housing Need of cities this applies only to those authorities and guidance states this should not be met outside of the city authorities.
LP2040 324	James Bonner (Barton Wilmore) for Rugeley Power Station	SP10	yes	yes	yes	yes	yes	The overall vision for securing sustainable development is supported, in particular the encouragement for the re-use of previously developed land. However, the policy should include a number of other aims. The policy should identify where additional weight and support can be provided for developments which are investing in infrastructure which can provide wider benefits, such as is the case with the outline permission for the redevelopment of the former Rugeley Power Station.	No changes required.	Local Plan 2040 is supportive of the re-development of brownfield sites.
LP2040 325	James Bonner (Barton Wilmore) for Rugeley Power Station	SD2	yes	yes	yes	yes	yes	Rugeley Power Limited supports the flexibility with regard to renewable and low carbon energy being provided on or off-site providing it will not cause harm, including to nearby amenity or character/landscape.  SD2 sets out that development proposals are expected to make a positive and marked contribution to moving towards a zero-carbon economy. We support this policy as set our Client is keen to support the move towards low and zero carbon development. This is demonstrated through the recent all school submission, which is designed to be a zero carbon development. The policy should be applied flexibly to ensure that new innovative methods can be used.	No changes required.	Support noted.
LP2040 326	James Bonner (Barton Wilmore) for Rugeley Power Station	SP12	Yes	Yes	yes	yes	yes	At Table 7 of Strategic Policy 12, East of Rugeley is identified as being committed for 800 dwellings (at 1st April 2020) based upon the existing Site Allocation Local Plan. Schedule 3 of Appendix Identifies that an outline planning application has been submitted for 800 dwellings. A footnote to the entry states that the submitted planning application is for a higher yield than the Site Allocations policy.  To ensure the draft Plan is effective and positively prepared, it is important that the allocation and recent planning permission are consistent. As part of the approved outline, we anticipate that approximately 1,264 of the 2,300 dwellings proposed will be in Lichfield District. The draft allocation should reflect the planning application status, yield and boundary. It is clear that the site can make a significant contribution to delivering housing sustainably on brownfield land during the plan period.  The focus on maximising opportunities on brownfield sites is strongly supported and is considered consistent with national policy.  As identified in our response to SP1 we think the drat plan should identify that the site capacity of the east of Rugeley allocation should be at least 1,264 dwellings to reflect the extant outline planning permission, and ideally at least 1,437 dwellings to reflect the potential increased capacity at higher density.	No changes required.	Comments noted. Base date of housing data within the Local Plan 2040 is 2019/20. Planning application for increased yield has been approved since that base date. Monitoring data for 2020/21 onwards will reflect the approved planning application. Not considered necessary to change data within Table 7 as this was taken at a point in time.



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LP2040 327	James Bonner (Barton Wilmore) for Rugeley Power Station	H1	yes	yes	yes	yes	yes	<p>We broadly support the approach to provide developers with some certainty on housing mix alongside the welcome addition of 'significant' to the policy wording, which acknowledges the need for flexibility. However, we think further flexibility can be achieved by ensuring the housing mix is regularly reviewed and updated where necessary by the council to reflect changing needs over the plan period. this can be done through updated evidence and/or a supplementary planning document (SPD). We also suggest that the overall policy wording could be clarified further to state that where a housing mix is broadly in line with requirements set out within the policy (or HEDNA/SPD) it will be considered acceptable.</p> <p>The policy should recognise that the requirements cannot be applied as a blanked approach. it needs to be applied flexibly to reflect individual characteristics of sites.</p> <p>"Proposals for new residential development will be expected to make efficient and effective use of land and to be developed at the optimum density...</p> <p>...New housing development will be expected to achieve a minimum net density of 35 dwellings per hectare, except in Lichfield city and Burntwood, where densities of 50 dwellings per hectare should be achieved in locations benefiting from good public transport links".</p> <p>We support the first paragraph which seeks to ensure that new housing development is built at optimum density. However, the second part of the policy regarding 50 dwellings per hectare requires some clarification.</p> <p>The policy should lend support for higher density development in sustainable locations where achievable, and the should be acknowledgement of flexibility in the housing mix to help deliver this.</p> <p>The following changes should be considered to ensure the draft Plan is positively prepared, justified, effective and consistent with national planning policy:</p> <p>1. The housing mix policy should commit to being regularly reviewed and updated where needed to reflect changing needs over the plan period.</p> <p>2. The housing mix policy should allow for flexible implementation, to reflect the individual characteristics of sites and development periods. The policy should set out that broad compliance with the desired housing mix would be acceptable.</p> <p>3. The density policy should specifically identify other locations such as Rugeley and the former Power Station site, alongside Lichfield city and Burntwood, as a sustainable location where</p>	No changes required.	Policy H1 is based upon up to date evidence within the HEDNA which details the housing mix required to meet the District's housing need based upon demographics. The policy provides flexibility within each type/size of house to ensure the policy is flexible.
LP2040 328	James Bonner (Barton Wilmore) for Rugeley Power Station	H2	yes	yes	yes	yes	yes	<p>Given the allocation east of Rugeley is 'saved' from the site allocations local plan (and is not a new strategic allocation), the affordable housing provision for the site was not addressed. As part of the outline permission for Rugeley, it was agreed that all phases of development that deliver class C3 dwellings, shall deliver a minimum of 15% of the class C3 dwellings as affordable housing, with an overall minimum provision site wide of 17.6%. This was based on the use of the national vacant building credit.</p> <p>In principle there we have no issues with affordable housing targets, we support the aims, however would welcome clarity on the affordable housing provision for the east of Rugeley allocation, because it does not appear to fall into any of the identified categories.</p> <p>The following changes should be considered to ensure the draft Plan is justified, effective and consistent with national planning policy:</p> <p>1. East of Rugeley should be identified in the policy table as requiring a minimum affordable housing target of 17.6%, unless viability evidence is provided to demonstrate that this is not deliverable.</p>	No changes required.	East of Rugeley site is identified at Appendix D within the schedule of saved policies/sites from the adopted Local Plan. Planning permission has been granted, affordable housing delivery will be in accordance with consented planning permission.
LP2040 329	James Bonner (Barton Wilmore) for Rugeley Power Station	SP14	yes	yes	yes	yes	yes	<p>The updated SP14 for centres no longer provides such support and does not reference the emerging centre at the site (although it makes reference to examples of neighbourhood centres and gives recognition of centres outside the district). The NPPF through para 92 refers to policies promoting social integration and mixed development, strong neighbourhood centres etc. Table 4 of Sp1 refers to the 'retention and improvement of local services to meet local needs'</p> <p>We request that SP14 identifies that the new neighbourhood centre at Rugeley power station within the councils retail hierarchy. It is important that greater recognition is given to the site and its benefits for promoting social interaction. This would align with policy SP14 with the NPPF and updated SP1 which recognises the sustainability of east of Rugeley as a location of growth.</p> <p>Suggested change</p> <p>The following change should be considered to ensure the draft Plan is positively prepared and consistent with national planning policy: x The retail hierarchy should include the proposed new retail centre within the redevelopment of the former Rugeley Power Station site.</p>	No changes required.	East of Rugeley site is identified at Appendix D within the schedule of saved policies/sites from the adopted Local Plan.
LP2040 330	James Bonner (Barton Wilmore) for Rugeley Power Station	Whole Plan	yes	yes	yes	yes	yes	<p>The policies map July 2021 and the non-strategic housing allocation saved policy boundary 'east of Rugeley' is not consistent with the approved plans, including the parameter plans (see Access parameter plan at appendix 1). In particular, the south eastern area of the site, incorporating the borrow pit and approved second access, has not been included within the site for redevelopment. For completeness and to ensure that the draft plan is effective we requested that this is amended.</p> <p>We consider that the delivery of this mixed use development at the site could help to address many of the key issues identified at para 3.3 of the draft plan. Notably, the recognised challenge of meeting strategic housing and employment requirements; including assisting in meeting needs from within the wider Greater Birmingham and Black Country Housing Market Area (GBHMA).</p> <p>Overall, Rugeley Power Limited broadly supports the councils draft plan, and welcomes the decision to save the 'East Rugeley' allocation from the previous Local Plan.</p>	No changes required.	East of Rugeley site is identified at Appendix D within the schedule of saved policies/sites from the adopted Local Plan.
LP3040 331	Philippa Kreuser (CT Planning) for Essington Park Ltd	E2	n/a	n/a	no	yes	yes	<p>Support the inclusion of Local Policy E2 in the proposed publication document. Support the policy intent to support development connected with local and national tourist attractions in the District such as the National Memorial Arboretum and in particular to support the delivery of new assets associated with such attractions, particularly where they contribute to the growth of the visitor economy. However, it is submitted that the policy statement should be extended to include the specific provision of new hotel facilities close to the arboretum. There is a lack of quality hotel accommodation in the vicinity that is universally acceptable. land is available to serve this need.</p> <p>The site is sufficient to provide a hotel/overnight accommodation as well as car, coach and 24 hour lorry parking alongside fuel points and a food outlet.</p> <p>Essington Park Ltd is seeking the allocation of land west of the A38/North of Alrewas as an RSA. this would bring economic benefit and diversification of the rural economy and creation of jobs, it would provide the opportunity to remove HGV traffic from the village and redevelopment of the Ivy Garage site.</p> <p>Local policy E2: should be amended to refer to the specific provision of a hotel/overnight accommodation on land west of the A38/North of Alrewas promoted as a roadside service area and the allocation identified on Inset 4.</p>	No changes required.	Supported noted. Local Plan 2040 provides support for hotel accommodation in support in accordance with other policies within the plan. Not considered necessary to allocate promoted site.

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LP2040 332	Philippa Kreuser (CT Planning) for Essington Park Ltd	SP2	n/a	n/a	no	yes	yes	<p>Support the inclusion of SP2: Sustainable Transport and in particular that the policy seeks to support 'improvements to the wider road network'. However, the policy should go further and specifically refer to the provision of a roadside service area (RSA) as one of the road network improvements being sought.</p> <p>Lichfield city is located close to a number of trunk roads. Provision of an RSA in the vicinity is entirely appropriate given its location within the strategic road network in Staffordshire. Furthermore, it is increasingly being reported that residential streets are being used by HGV's for overnight refuge, a particular issue for Streethay and at Fradley. The LPA should recognise this issues and general need to cater for the welfare of all road users and provide a purpose built RSA which offers 24 hour parking, fuelling points and overnight accommodation.</p> <p>Land west of A38/North Alrewas is sufficiently large to provide car, coach and 24 hour lorry parking alongside good outlet and fuelling points, including electric charging points as well as a hotel/overnight stay accommodation on site. Essington Park Ltd is seeking the allocation of the land west of the A38/North of Alrewas as an RSA, providing economic benefits and the creation of local jobs.</p> <p>It is submitted that SP2 be amended to refer to the specific provision of a roadside service area on land west of A38/North of Alrewas and the allocation identified on Inset 4.</p>	No changes required.	Support noted. Not considered necessary to allocate promoted site.
LP2040 333	Mrs Janet Hodson (JVH) Mr M Neachell	SP1	no	no	no	yes	yes	<p>The strategy as proposed realises on three large urban extensions and a smaller site at Whittington. It makes no smaller allocations in large villages beyond the plan period to allow for growth. It is considered that the plan is flawed in its reliance on this limited selection of very large development sites Failure of these sites to come forward early in the plan period will lead to a lack of available land. this type of site allocation does not meet the requirements of local and regional housebuilders who require a range of smaller sites which can be delivered by that sector and gives a choice of land and product in the housing market. The plan should be changed to allow for the inclusion of sites within the large villages which can provide smaller scale development opportunities. These sites should either be in addition to the proposed allocations or by replacement of one of the proposed sites at Fradley or Fazeley. Two much suitable sires are Park Lane Bonehill and Aldin Close Bonehill, which lies central to the village and are readily deliverable and developable and together could accommodate around 250 units.</p> <p>The plan should include a policy that will allow development on the edge of these type of settlements that meets sustainable development criterion.</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.
LP2040 334	Mrs Janet Hodson (JVH) Mr M Neachell	SP12	no	no	no	yes	yes	<p>The housing provision in the local plan covers the period 2018-2040 and proposes the allocation of 9,727 new homes to meet the housing need. Of this come 2,665 dwellings are to provide for Birmingham/black country requirements after 2027. The plan is said it to have a brownfield focus yet none of the principle housing allocations are on brownfield land. Table 7 of the plan indicates that the whole strategy relies on four greenfield sites to deliver the growth 2040. Table 7 is considered to be unreliable in terms of commitments, for example the settlement of Armitage and Handsacre is said to have a committed supply of 204 dwellings, yet 25 plots have not been lost to HS2. There may be too little or no buffer available.</p> <p>we object to the large SUE allocation SHA2 at Fazeley for 800 units. This site extends the settlement far to the west away from the facilities currently available and extends the settlement out into the open countryside. Other sites are available which can assist in meeting the housing need in Fazeley/Mile Oak/Bonehill which are better related to the settlement structure and are a more sustainable development solution. Two sites at Park Lane Bonehill and Aldin Close Bonehill have a combined capacity of around 250 units in a more sustainable location.</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.
LP2040 335	Mrs Janet Hodson (JVH) Mr M Neachell	LH1	no	no	no	yes	yes	We object. The sites that are chosen at housing locations will not deliver a balanced housing market. They do not include any smaller scale suitable for the local/regional housebuilders.	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.
LP2040 336	Mrs Janet Hodson (JVH) Mr M Neachell	LH2	no	no	no	yes	yes	<p>These sites are the wrong sites to allocate. All of these sites are greenfield sites and it is extraordinary that they should be required to deliver less affordable housing than for example a green field site coming forward elsewhere.</p> <p>in regards to para 8.3 64% of the LPA housing requirement is fir affordable housing, then it is impossible to understand how the major development locations should satisfy so little of the requirement. If the plan remains as drafted then the affordable housing requirement simply cannot be met. The strategy needs to be altered to ensure that inter alia the affordable housing requirement will be met in full.</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.
LP2040 337	Mrs Janet Hodson (JVH) Mr M Neachell	SHA2	no	no	no	yes	yes	<p>We object to inset map No 11, objection is made to this large SUE allocation. The allocation extends the settlement far to the west away from central facilities and retail opportunities. This extends the linear nature of the Fazeley/Bonehill/Mile Oak settlements further in a linear manner and does not consolidate the built environment. Other sites are available in this sustainable settlement such as land at park lane Bonehill and Aldin Close Bonehill that re located at the centre of the community which can consolidate the settlement.</p> <p>We object to the development boundary proposed on this Inset Plan 11 which excludes the above sites at Bonehill from the development boundary.</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.
LP2040 338	Mrs Janet Hodson (JVH) Mr M Neachell	SP11	no	no	no	yes	yes	<p>We object to the green belt policy, the green belt has been amended at Fazeley to remove land for the large SUE. The green belt should be amended to allow development in less crucial green belt locations such as Park Lane Bonehill and Aldin Close Bonehill which will not result in large scale encroachment into the open countryside and where the green belt purposes are not compromised.</p> <p>We object to the fact that no safeguarded land is shown as removed from the green belt to allow for the development of settlements in the longer term.</p> <p>Inset 11 Fazeley, Mile Oak &amp; Bonehill We object to the green belt and development boundary as shown on the Map 11 Land at Park Lane Bonehill and Aldin Close Bonehill should be excluded from the green belt and included within the development boundary.</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.
LP2040 339	Mrs Janet Hodson (JVH) Mr M Neachell	Whole document	no	no	no	yes	yes	<p>We object to the plan on the basis there is no policy on safeguarded land, to ensure that settlements within the green belt can develop in a sustainable manner in the longer term.</p> <p>The plan fails to include a policy that would allow development on the edge of the smaller settlements in sustainable locations. Such a Policy should be inserted into the plan to provide. For small scale sites and to achieve flexibility in the Plan</p>	No changes required.	Safeguarded land is not considered to be required within the Local Plan 2040, particularly given Governments stated intent to introduce new planning system.



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LP2040 340	Chris Timothy (CT Planning) H Lillingston (Thorpe Estates)	Para 4.4	n/a	n/a	yes	yes	yes	<p>The Thorpe Estate support Lichfield District Councils proposal (para 4.40- 4.42) to investigate the potential for a new settlement to meet the housing needs of Lichfield District beyond 2040. Whilst the new settlement is not required to serve the development needs of Lichfield District in this plan period, it is submitted that there is a need to commit to an early review of the local plan so that the location for a new settlement can be identified and it can be brought forward such that it makes a meaningful contribution towards the development requirements of the next plan period.</p> <p>The development of a new settlement in Lichfield District can reduce increasingly acute development pressures from around settlements in the District and pressure to release more land from the Green Belt. It provides an opportunity to create an exemplar new settlement that represents a well-planned and sustainable community for living and working in the 21st century and the latest environmental innovation.</p> <p>The estate is willing to work alongside LDC and neighbouring authorities, local community and key stakeholders to develop proposals to deliver a new settlement at Thorpe Constantine.</p>	No changes required.	Local Plan 2040 proposes sufficient land allocations to meet the housing requirement set out within the plan. The selection of allocations has been based upon consideration of the extensive evidence base which supports the Local Plan. New settlement is not part of the Spatial Strategy of the Local Plan 2040.
LP2040 341	Susan Rowley	SHA2	no	no	no	yes	yes	<p>LDC has not worked with the local community, Tamworth Borough Council or Fazeley local council. LDC have not accepted the objections made by hundreds of people in opposition to SHA2.</p> <p>SHA2 is in a designated Green Belt area or does this rule not matter for LDC? There are so many congestion problems along the Sutton Coldfield Roads at Mile Oak, this will be further exacerbated beyond breaking especially when compounded by seasonal traffic caused by Drayton Manor Park.</p> <p>Tolsons Hill is an example of true development of what is strongly advised by the Government that brownfield sites are used rather than obliterate green belt. There are still brown field sites in Fazeley that could be used. People moving into the currently existing homes are finding it almost impossible to register with doctors, dentists etc. and primary schools are already under pressure. Tamworth facilities will be overstretched not Lichfield. To add a further 800 households will be crippling within the area. Planning applications show areas designated as schools, playground areas, shops, medical centres, even a pub are shown once the developers/builders take over we see high density housing and all previously mentioned facilities are discarded let alone including 'affordable housing'. Without facilities implemented the pressure will be on Tamworth. Existing development should be considered in Fazeley, parking is extremely difficult. Traffic flow is gridlocked on many occasions. Saturdays, Sundays and Bank Holidays are a prison to local residents. Adding a further 800 households with over 1000 residents will be a nightmare.</p> <p>The local plan is only effective in exacerbating traffic flow, infrastructure is not in place for this level of development. HS2 development across Sutton Road will put severe pressure on the area. Ecologically the development is a disaster for many species, biological flora and fauna, bird populations, insects, cold blooded animals as well as other animals that depend on that land for their habitat.</p> <p>The land which borders the Tame and Anker rivers along with many other water courses such as Bourne Brook, together with local canals is low lying land which only avoids regular flooding with careful management and operation of service gates, particular reference to those deployed by Drayton Manor which can also be impacted by the use of service gates operated on reservoirs closer to Birmingham City. Poor communication between these powers, combined with heavy rainfall saw serious flooding in the Brookside area of Fazeley some years ago. Build on fields that currently absorb much of the water in the area and it is a safeguard for residents. How can you be destroying green belt when we need to act to prevent more disastrous effects of climate change? Brownfield sites should be used first for development. Do not implement development of SHA2 from the local plan 2040. Urge developers to seek out brownfield sites - the area opposite Fallow Road in Fazeley has been derelict for 45 years and could be used. LDC have ignored hundreds of objections to SHA2 raised by the local community and there has not been enough consultation with other local councils.</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. Transport evidence is being undertaken having been postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.
LP2040 342	Teresa Woods	Whole document	No	No	No	Yes	No	<p>Results of the 2019 Green Belt Review have not been interpreted correctly and the site should not have been released from the Green Belt.</p> <p>No traffic assessment has been done, 800 new houses will cause chaos for Fazeley, Mile Oak and surrounding areas.</p> <p>Green Belt land is not protected, it could possibly cause flooding and the extra traffic could cause health problems: asthma etc.</p> <p>Remove strategic housing allocation SHA2 from the local plan 2040, this should never be an option, and look for another large site to allocate and one that isn't Green Belt land, and doesn't cause chaos to surrounding areas.</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. Transport evidence is being undertaken having been postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.
LP2040 343	Fradley and Streethay Parish Council	SHA1	n/a	n/a	n/a	n/a	yes	<p>LDC has deliberately separated Fradley and Streethay villages even though they are run by a joint parish council. This separation serves to obscure the cumulative impact many of the proposals will have on our parish.</p> <p>From the four proposed SHA's Fradley is taking 3800 of these houses - 81% of the allocation. This is not made clear and could lead residents to believe that Lichfield City is taking the lion's share as street hay's allocation is counted as Lichfield's contribution.</p> <p>We do not believe that SHA1 fits with policies SP10 or SD1. There is no clear evidence that this development is deliverable. We do not believe that other alternatives have been properly explored. There are massive constraints for the area. SP10 discusses that developments should 'be of a scale and nature appropriate to its locality' It cannot be argued that SHA1 fits with this policy as it clearly does not.</p> <p>Fradley is surrounded by country-side but it is important that within its boundaries areas of parkland are identified so that the village maintains its attractive semi-rural character.</p> <p>Fradley and Streethay Parish Council does not believe this emerging local plan is effective or deliverable. LDC have failed to understand the needs of residents and have not consulted sufficiently. There is an enormous infrastructure gap in the village. There is not enough evidence to show why this location is better than alternatives. Taking on 63% of the district's housing total is not acceptable or clearly thought out.</p>	No changes required.	Local Plan 2040 seeks to plan for the Council's established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered in support of development.
LP2040 344	Fradley and Streethay Parish Council	SP12	n/a	n/a	n/a	n/a	yes	<p>Table 7 is difficult to unpick in terms of the impact on Fradley and Streethay Parish Council. It is also inaccurate and needs to be viewed with policy LC1 in LDC local plan allocations document. Streethay has already committed to 750 houses, plus 310 from the allocations document and has 3300 more proposed (4360 total). Fradley has already committed to 1250, plus 63 from the allocations document and has a proposed 500 more (1813 total). Therefore the total allocation for Fradley and Streethay Parish Council is 6173, from the Plan's total figure of 9727 homes. This represents 63% of the total new homes for the district. This also does not include other proposed developments in Fradley so the figure in reality could be higher. Allocating two thirds of LDC's whole district areas new homes within one parish is neither feasible nor sustainable.</p>	No changes required.	Local Plan 2040 seeks to plan for the Council's established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.
LP2040 345	Fradley and Streethay Parish Council	LC1	n/a	n/a	n/a	n/a	yes	<p>Policy LC1 makes no sense, LDC have included Streethay in Lichfield's allocation and yet it wishes to create a 'strategic gap' between Lichfield City and Fradley and Streethay. SHA1 will clearly join Lichfield with Streethay and would spread into Fradley if it were not HS2 cutting between the two villages. This cannot enhance the rural feel to the area. Curborough and Streethay villages will merge into one giant estate of over 5000 houses.</p>	No changes required.	Local Plan 2040 identifies strategic housing allocation to north-east of Lichfield. Allocation is adjacent to strategic allocation within adopted Local Plan. Strategic Gap policy seeks to provide strategic gap between strategic allocation and the built area of Fradley to the north.

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LP2040 346	Fradley and Streethay Parish Council	LC2	n/a	n/a	n/a	n/a	yes	Local Policy LC2 is vague, especially with regard to 'safeguarding the views of roof-scapes over Lichfield' – how can this be protected, enforced or determined? Does SHA1 fit with this policy?	No changes required.	Policy refers to views across the roof-scapes within Lichfield City conservation area.
LP2040 347	Fradley and Streethay Parish Council	B6	n/a	n/a	n/a	n/a	yes	Local Policy LC2 is vague, especially with regard to 'safeguarding the views of roof-scapes over Lichfield' – how can this be protected, enforced or determined? Does SHA1 fit with this policy?	No changes required.	Policy refers to views across the roof-scapes within Lichfield City conservation area.
LP2040 348	Fradley and Streethay Parish Council	SHA3	n/a	n/a	n/a	n/a	yes	Part of SHA3 actually lies within Fradley Parish, so the figures within this document are again skewed to show that Lichfield City is taking on a larger number of houses, when Fradley will be taking on yet more houses instead. Part of SHA3 actually lies within Fradley Parish, so the figures within this document are again skewed to show that Lichfield City is taking on a larger number of houses, when Fradley will be taking on yet more houses instead. How will LDC ensure that these 'essential community infrastructure assets' will be provided when delivering only 500 houses? SHA3 states that amongst many other things, you expect the developer to deliver a neighbourhood centre, a community hub, allotments, sports pitches, play areas, primary health provision, funding towards primary and secondary schools and funding towards A38 and road network improvements. Assuming that the developer(s) cannot deliver all of these things when building only 500 houses, then Fradley will continue to have a 'significant gap in infrastructure provision'. The land area outlined for SHA3 could deliver many more houses and if this is necessary to provide the needed amenities, then this should be considered.  Appendix B22 is in contradiction to SHA3, as it states that a primary school will be provided, whereas SHA3 includes funding towards primary and secondary provision. Appendix B22 also does not mention the Neighbourhood Centre or Primary Health provision, as per SHA3.  Appendix B22 is in contradiction to SHA3, as it states that a primary school will be provided, whereas SHA3 includes funding towards primary and secondary provision. Appendix B22 also does not mention the Neighbourhood Centre or Primary Health provision, as per SHA3.	No changes required.	Housing figures within Local Plan 2040 relate to settlements to which they are associated, not Parish Council administrative areas. This is consistent with the approach in the adopted Local Plan.
LP2040 349	Fradley and Streethay Parish Council	FR4	n/a	n/a	n/a	n/a	yes	We strongly disagree with this policy. In fill development and brownfield land should be prioritised in Fradley. Lots of open space has been removed in Fradley due to infill development, there is also gaps in infrastructure provision.	No changes required.	Policy FR4 provides support for infill development and the re-use of previously developed land within the village. This is consistent with policy for all settlements within the Local Plan 2040.
LP2040 350	Fradley and Streethay Parish Council	LT1	n/a	n/a	n/a	n/a	yes	Reducing parking provision should not consider as a strategy to reduce the use of private cars. With developers not providing adequate parking provision and not providing visit parking and LDC taking this stance, then the result will be more on street parking, locking pavements and creating dangers for drivers and pedestrians. We would also like to see garages of a sufficient size to fit modern day cars and less tandem parking bays and tandem garages.	No changes required.	Policy seeks to provide appropriate car parking for development as set out in supplementary planning documents.
LP2040 351	Fradley and Streethay Parish Council	Whole document	n/a	n/a	n/a	n/a	yes	There is not nearly enough information on addressing the issues of climate change. This is a very important issue that needs more detail and coherent ideas on how to make effective changes through the district. Primary health care provision remains a significant infrastructure need, the pledge to address this in 15.50 needs to be strengthened.	No changes required.	Local Plan 2040 includes policies with regards to how development will seek to address the impacts of climate change. This is supported by evidence including the Staffordshire Climate Change, Mitigation and Adaption study.
LP2040 352	Jennifer Hawkings	Whole Document	No	No	No	Yes	No	The council has not worked with TBC and Fazeley Town Council or the community to select SHA2. The council have ignored the hundreds of objections to SHA2 raised by the local community.  The plan does not comply with NPPF on protecting Green Belt land, lack of highways evidence.  the council have not properly considered all reasonable alternatives to SHA2 which is in the greenbelt, SHA2 should not have been selected before gathering evidence on traffic assessments, impact on local infrastructure, high school places.  The local plan is not consistent with the NPPF sections 2, section 5, section 8, section 13, section 14, section 15.  Remove SHA2 from the Local Plan 2040.  Allocate another large site that is not in the greenbelt and is closer to a train station.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.
LP2040 353	John Adams, Lichfield Rail Promotion Group	Whole Document	Unanswered	Unanswered	Unanswered	Yes	Unanswered	Lichfield Rail Promotion Group supports the proposals but recommends that some need to demonstrate a greater commitment.	No changes required.	Support noted.
LP2040 354	John Adams, Lichfield Rail Promotion Group	Para 3.11	Unanswered	Unanswered	unanswered	Unanswered	Unanswered	We support the proposal that all major developments should have access to railway hub. In most cases it will be necessary to ensure that the provision of bus services are integral to any planning approvals.  the plan should commit to the provision of integrated bus service to local stations for new planning approvals such as Cricket Lane, Fradley	No changes required.	Support noted.
LP2040 355	John Adams, Lichfield Rail Promotion Group	Para 3.12	Unanswered	Unanswered	unanswered	Unanswered	Unanswered	The APP for Burntwood and Transport Safeguarding policy should both specifically include safeguarding the railway line between Lichfield and Walsall, and for it to be re-opened as a railway line with a station to serve Burntwood, for instance at Anglesey Sidings.	No changes required.	Area action plan for Burntwood will be progressed following the adoption of the Local Plan 2040.
LP2040 356	John Adams, Lichfield Rail Promotion Group	Para 4.9	Unanswered	Unanswered	unanswered	Unanswered	Unanswered	In recent years new settlements have already been established that require access to improved rail services and new stations. The Plan should state clearly that passenger services between Lichfield and Burton upon Trent are required now, to include a station at Alrewas to serve that community and the National Memorial Arboretum. The Plan should state that the District Council will continue to support the feasibility studies currently undertaken by West Midlands Rail Executive and to work proactively with East Staffordshire District Council and Staffordshire County Council to fulfil this aim which will also benefit the local visitor economy and alleviate the impact of the current industrial and housing developments on the A38 trunk road.  All these omissions must be corrected. The District must be active, not passive stakeholders in the development of passenger rail services between Lichfield and Burton. A new station at Alrewas is at the heart of this development.	No changes required.	Local Plan 2040 provides support for enhancements to existing and new rail services.
LP2040 357	John Adams, Lichfield Rail Promotion Group	Para 14.2	Unanswered	Unanswered	unanswered	Unanswered	Unanswered	There is no mention in any reference to Alrewas of the commitment in the Alrewas Neighbourhood Plan to support the introduction of passenger rail services. There is no mention of the District's commitment to improve visitor connections to the National Memorial Arboretum (NMA). There is no mention of the initiatives by West Midlands Rail Executive to develop passenger services between Lichfield and Burton upon Trent to include a station to serve the NMA	No changes required.	Local Plan 2040 provides support for enhancements to existing and new rail services.
LP2040 358	John Adams, Lichfield Rail Promotion Group	Para 3.19	Unanswered	Unanswered	unanswered	Unanswered	Unanswered	Support this objective but believe that, in the absence of clear supporting action plans, a stronger statement is needed - we recommend that a stronger commitment will be evidenced by replacing the soft statements of should with a clear, direct statement.	No changes required.	Local Plan 2040 provides support for enhancements to existing and new rail services.
LP2040 359	John Adams, Lichfield Rail Promotion Group	Para 4.8	Unanswered	Unanswered	unanswered	Unanswered	Unanswered	Land required for proposed infrastructure improvements will be safeguarded. Rail travel will be enhanced through environmental at Lichfield City and Trent Valley stations. This proposal is strongly supported by the group.	No changes required.	Support noted.
LP2040 360	PJ Triplow, Berrys	H2	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	We welcome and support policy H2, which states that affordable housing will be supported on small rural exception sites, where those sites adjoin a settlement boundary and are in proportion to the size of the settlement. Sites 157 to 160 adjoin the settlement boundary of Stonnall. The largest of the four is roughly one eighth the size of the present built up area.	No changes required.	Support noted. Local Plan 2040 does not allocate sites for development at Stonnall.

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LP2040 361	PJ Triplow, Berrys	SP11	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	We welcome policy SP11, which expresses support for affordable housing on rural exception sites in the green belt. Our clients land offers an excellent opportunity to provide such development.	No changes required.	Support noted. Local Plan 2040 does not allocate sites for development at Stonnall.
LP2040 362	PJ Triplow, Berrys	SP1	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	<p>SP1 states that a minimum of 9727 homes will need to be provided by 2040. Of these, only 5% are to be provided in the District smaller villages. The majority of these homes are to be provided either within or adjoining the urban areas of Lichfield, Rugeley or Tamworth. We fully understand the advantages but we wish to point out that the distribution of housing proposed in the local plan not only fails to tackle the lack of affordable housing in rural areas, but makes the problem worse by directing most such developments into towns.</p> <p>The great majority of the Districts villages have no land allocated for development with the local plan. This is a particular issues in Stonnall, with a tight boundary and pattern offers little opportunity for infill. we question how the needs of this village are met in the local plan as outlined in paragraphs 2.9 and 3.8 our clients land is unconstrained and available for development.</p> <p>We suggest that SP1 be amended to reflect the importance of removing barriers to housing in the rural area. This could be achieved by amending the fifth bullet points as follows:  - within and adjoining the village settlement boundaries of the remaining service villages and smaller rural villages;  and by amending the third column on the bottom two rows of table 4 to say:  Approx. 10% of housing between level 4 and level 5 villages.  NB the figures shown in table 4 add up to 107%, so we would leave it to you to determine how to accommodate this change within the remaining figures.</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.
LP2040 363	PJ Triplow, Berrys	Whole document	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	<p>We also support the inclusion of the following paragraphs in the Plan:  Para 2.8, which states that the average house price in Lichfield is £70,000 more than in the neighbouring Birmingham / Black Country conurbation.  Para 2.9, which states that the rural parts of the District lack the smaller properties needed for those trying to get on the property ladder or wishing to downsize.  Para 2.10, which states that the Lichfield District forms part of a housing market area with a significant unmet housing need.  Para 3.3, which states that meeting the needs of this housing market area and tackling the lack of affordable housing will be key issues for the Local Plan to address.  Para 3.8, which states that high house prices, against a background of a lack of supply, are key issues for the rural part of the District.</p>	No changes required.	Support noted.
LP2040 364	Susan Kneill Boxley (CPRE)	SP12	No	Unanswered	No	Yes	Yes	Pages 77 and 78 1. If appropriate to modify, the italicised part of the policy in the light of consideration of the views of neighbouring authorities made under duty to co-operate. "The District Council will plan, monitor and manage the delivery of a minimum of 9,727 homes within the District between 2018 and 2040 ensuring that a sufficient supply of deliverable and developable land is available to deliver around 321 homes per year between 2018 and 2027, and 526 homes per year between 2027 and 2040 to assist with the demonstrable housing market area shortfall between these dates. New housing will be focused upon the existing built/urban areas and the key urban and rural settlements identified within the settlement hierarchy" This is so to allow for change as a result of considering the responses of the LPA's under the duty to cooperate, require LPA to produce reasoning and evidence on which 205 new homes is based 3, to allow LPA to indicate how additional housing will impact on reducing housing requirements 4. indicate how this will impact on affordable housing to serve other councils.	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.
LP2040 365	Susan Kneill Boxley (CPRE)	Whole Document	No	Unanswered	no	Yes	Yes	<p>We have not found evidence of meeting the Duty to Co-operate. If we can be provided with this we will re-consider the representation.</p> <p>Plan is justified however there are some issues: 1. No justification part of the over-allocation of housing. 2.The proposals that a significant part of the over allocation should be met by strategic allocations in Greenfield land in the Green Belt. 3. There is no justification for the policy changes in relation to the provision of affordable housing 4. We also would wish to see the views of neighbouring LPAs on additional housing provision to meet their shortfalls.</p> <p>The housing allocations are contrary to NPPF particularly in relation to the major over-allocation of housing and the proposals for strategic housing sites in the Green Belt. Inconsistent with: NPPF Chapter 5.</p> <p>Radically revise table 7: Housing delivery to delete a number of strategic allocations including Fazeley, Mile Oak &amp; Bonehill and Whittington and to reduce or delete others in order to be close to number of 9727 new homes referred to in the first paragraph of the policy.  Substitute new paragraphs 8.6 and 8.7. Such supply demonstrated in table 7 is in excess of both the minimum housing requirement of 6838 new homes for the needs of LDC and 2889 homes to assist with meeting the demonstrable I housing market area shortfalls of councils in the Black Country and Birmingham. No allowances have been made for Windfall sites in the plan.</p> <p>If a major development is not delivered when anticipated it is unlikely that the housing requirement of 9,727 new homes will be completed by 2040  For the examination if the same windfall information as has been produced for sites of fewer than 5 new homes could be produced for sites of five or more new homes and made available in advance of the examination to enable the x and y numbers to be agreed at the examination.</p>	No changes required.	Lichfield District Council has worked with partners through the Duty to Cooperate through the progression of the Local Plan. District Council is in the process of preparing statements of common ground.
LP2040 366	Susan Kneill Boxley (CPRE)	SP11	No	Unanswered	no	Yes	Yes	<p>Pages 71 and 72 - delete from the last paragraph of policy SP11. These allocations are wholly unnecessary for the reasons given in relation to SP12. leave small non strategic changes to the Green Belt Boundary made through neighbourhood plans, may be appropriate to meet local needs. Delete from para 7.23 Within LD such circumstances have been determined to exist in terms of removing land from the green belt so that it would read: 7.23 National Planning Policy Framework makes clear that changes should only be made to the Green Belt boundary in exceptional circumstances. Non-strategic changes to the Green Belt may be appropriate around smaller settlements to meet local needs, any such changes would be made through neighbourhood plans.  Reason:- to be consistent with SP11</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.
LP2040 367	Susan Kneill Boxley (CPRE)	H2	No	Unanswered	no	Yes	Yes	<p>We consider that the proposed policy is so inadequate and unjustified as to be considered fundamentally unsound. It also appears to us to unjustifiably different to other similar policies of neighbouring authorities and elsewhere in England.  We consider that the existing policy has been successful in delivering a fair percentage of affordable homes and should not be replaced by the proposed policy which would deliver less than half of the numbers of the current policy. We believe that the proposed policy would dramatically reduce delivery in circumstances where the proposed local plan.  The policy should remain the same.</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local Plan 2040 includes policies which seek to deliver increased levels of affordable housing and ensure that development remains viable.

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LP2040 368	Cerda Planning (Paul Harris) Leaf Property Group	Whole document	No	No	No	Yes	Yes	<p>This representation raises significant concerns with the plans soundness. Specifically the soundness of the plans spatial strategy both in terms of overall levels of housing growth and the distribution of homes within the district. In raising the concerns the leaf site represents a sustainable option to help address the identified deficiencies in soundness of the plan and deliver circa 50 new homes in a sustainable location which aligns with the councils policies. Land at Chorley Road, Burntwood- The site performs better against the councils criteria than the assessment which is set out in the site selection paper. This raises serious questions about the robustness and fairness of the councils site assessment process. At para 4.21 No detail on how the council will work collaboratively with authorities within the HMA through the duty to cooperate.</p> <p>Of concern is that now planned LDC's contribution is some 1,835 homes lower than the contribution (4,500) suggested at the preferred options stage. No explanation has been given as to why the contribution has fallen so significantly. It is not known how much GBBCHMA shortfall there will be at this stage. The backbone of the spatial strategy is the significant proposed allocation for 3,300 dwellings to the north east of Lichfield (SHA1) this represents 70% of new allocations. SUE's have inherently complex infrastructure requirements. Two of Lichfield's main strategic allocations from the existing plan adopted in 2015 have taken circa 5 years after the plan adoption to actually start delivering homes. The trajectory is unrealistic, its contribution to the unmet needs of the HMA unsubstantiated and by consequence it cannot be considered positively prepared. The council should be ensuring the deliverability of the required housing by including a greater range of smaller and medium sires which can both ensure a greater contribution to the unmet needs of the GBBCHMA.</p> <p>Policy SP1 sets out that growth will be directed towards sustainable locations broadly in accordance with settlement hierarchy. Leaf supports the principle of this balanced growth strategy. However the allocations they underpin the plan are not considered to align with this strategy. It is noted that sites (Lichfield is supported) that the remainder of growth is not directed to locations which are broadly in accordance with the settlement hierarchy. It is of greatest concern that despite being identified as level 2 the strategy does not allocate any growth to Burntwood. The previous and modest allocation of 400 homes to be delivered in the preferred options version has been deleted without explanation as well as Coulter Lane. There is no justification for a spatial strategy which fails to allocate any growth for the Districts second most sustainable settlement, yet allocates to lower level settlements. The council point to average delivery rates of 660 dwelling per year in the two years prior to April 2020, however in the preceding 10 year period the average over the past 10 years has been only 276 per annum. the delivery of 526 dwelling per year between 2027 and 2040 is considered to be unrealistic based on the average over the past 10 years.</p>	No changes required.	<p>Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.</p>
LP2040 369	Gary Stephens (Marons Planning) Bellway Homes Ltd	SHA2	N/A	N/A	N/A, No, N/A	Yes	Yes	<p>Policy SHA2 is not an appropriate strategy taking into account reasonable alternatives. SHA2 is in the green belt, the council must demonstrate it has examined full all other reasonable options. The plan does not demonstrate that options on the edge of Tamworth, outside the Green Belt have been examined. In particular site 370 the council has not provided information on why this site is not acceptable. SHA2 should be removed and replaced with strategic allocations to the north and south west of Tamworth in respect of land promoted by Bellway Homes sites 370 and 376.</p>	No changes required.	<p>established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.</p>
LP2040 370	Gary Stephens (Marons Planning) Bellway Homes Ltd	SP1	No	N/A	No,	Yes	Yes	<p>The council has not published with this plan any statement of common grounds that set out how it has engaged with neighbouring authorities to address cross boundary matters.</p> <p>The plan acknowledges para 2.10 a significant unmet housing need within the greater Birmingham and black country housing market area. In the absence of any evidence of cooperation it is not possible to respond that the plan complies with the DtC.</p> <p>SP1 is not positively prepared as it does not provide a strategy which meets the areas objectively assessed needs, nor is it informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and consistent with achieving sustainable development.</p> <p>SP1 has not deviated from the standard method for assessing LHN, despite there being circumstances where an increase could be justified in accordance with National Planning Guidance.</p> <p>Affordable housing will not be met,</p> <p>SP1 makes provision for 2,000 homes and no employment land towards Black Country's unmet needs.</p> <p>SP1 also makes provision for 665 homes and no employment land towards other neighbouring areas within the GBBCHMA. There is no agreement with other authorities within the GBBCHMA.</p> <p>Lichfield needs to take on need from CBBCHMA, Black country and Tamworth.</p> <p>Tamworth is not mentioned in policy SP1 and is not shown on the District Key Diagram at page 35. This apparent downgrading of its role is not explained or justified by any evidence in the plan or any separate document. The edge of Tamworth is not assessed in the councils sustainability study.</p> <p>Appendix A also includes 'Windfalls (1-4 dwellings)' and a 'Windfall allowance' as sources of supply. It is unclear from the Plan why there is a</p>	No changes required.	<p>Lichfield District Council has worked with partners through the Duty to Cooperate through the progression of the Local Plan. District Council is in the process of preparing statements of common ground.</p>
LP2040 371	Charles Meynell (Fisher German LLP) Nigel Storr	Policy SP1	Yes	No	No	Yes	Yes	<p>Fazeley has limited services, facilities and employment opportunities in comparison to higher tier settlements such as Tamworth. it is inevitable that residents will have to travel further to reach these services, facilities and employment opportunities. significant developments should not be focused on locations where the need to travel by non-sustainable modes is more likely as it will not mitigate the effects of climate change. SHA2 will not promote a sustainable pattern of development.</p>	No changes required. NB - Policies Map to be updated should indicative line of HS2 be amended. HS2 provide such data as appropriate.	<p>Regulation 19 consultation subsequent to the preferred options consultation, Draft plan available for consultation and explanatory text within the plan supports each policy. Preferred Options consultation document indicated area of new Green Belt in this location. Further evidence has led to the changes to the plan including the Strategic Gap policy. Local Plan 2040 identifies sufficient land to meet employment land requirements to 2040.</p>



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LP2040 372	Charles Meynell (Fisher German LLP) Nigel Storr	Policy SP13	Yes	No	No	Yes	Yes	Considers that the employment land requirements are greater than the available supply set out in the ELAA. The Local Plan has not considered the increased need for employment land resulting from the provision of housing to meet the HMA shortfall, which will increase out commuting. Additionally, changes in commuting patterns have been excluded from the employment and job forecast and assessment of employment land requirements within the HEDNA. LDC should factor out commuting into its assessment of employment land requirements. The HEDNA has excluded two of the largest developments from analysis of employment land requirements, including Prologis Park Fradley. The effect of excluding the two largest developments from the analysis is a much-reduced requirement under the completion trend scenario upon which the overall conclusions set out in the HEDNA with regard to employment land requirements are partially based. These conclusions are then replicated in the current consultation document without any further consideration given to whether the Local Plan should make additional provision for large scale employment sites. The need to make land available for operators looking for large high-quality sites appears not to have played any role in the formulation of the employment land policies. The latest study on strategic employment land requirements, the West Midlands Strategic Employment Sites Study (May 2021), concluded that the availability of investor ready sites, and existing and new space under construction, is very limited and that there is a shortfall in the supply of employment land. LDC should reconsider its role in addressing the wider employment need requirements and allocate land to provide for the needs of large logistics operators. Considers that Fradley Park offers the best opportunity for additional growth. 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 proposed to be included as part of the proposed North of Lichfield Strategic Gap identified at Policy LC1 of the Draft Publication document, and we set out our objections to this designation under a separate representation. the site is unconstrained and available for development. The Council's own assessment of the site as set out in the ELAA (Site 65) shows that the site is available and achievable, and the only noted suitability constraints are its greenfield nature, current use for agricultural purposes and location within Cannock Chase SAC zone of influence.	No changes required. NB - Policies Map to be updated should indicative line of HS2 be amended. HS2 provide such data as appropriate.	Regulation 19 consultation subsequent to the preferred options consultation, Draft plan available for consultation and explanatory text within the plan supports each policy. Preferred Options consultation document indicated area of new Green Belt in this location. Further evidence has led to the changes to the plan including the Strategic Gap policy. Local Plan 2040 identifies sufficient land to meet employment land requirements to 2040.
LP2040 373	Charles Meynell (Fisher German LLP) Nigel Storr	Policy LC1	Yes	No	No	Yes	Yes	In defining Green Belt Boundaries, plans should clearly define boundaries using physical features that are readably recognisable. there are no discernible features on the ground contrary to the framework.	No changes required. NB - Policies Map to be updated should indicative line of HS2 be amended. HS2 provide such data as appropriate.	Regulation 19 consultation subsequent to the preferred options consultation, Draft plan available for consultation and explanatory text within the plan supports each policy. Preferred Options consultation document indicated area of new Green Belt in this location. Further evidence has led to the changes to the plan including the Strategic Gap policy. Local Plan 2040 identifies sufficient land to meet employment land requirements to 2040.
LP2040 374	Charles Meynell (Fisher German LLP) Nigel Storr	Policy FR3	Yes	No	No	Yes	Yes	Support FR3 insofar that it seeks to retain Fradley Business Park as a focus for employment. Consider that additional land to the south of Fradley Park should be identified for employment development to meet 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. The third paragraph of Policy FR3 states that "New development shall provide for an appropriately located multi-purpose facility that provides for a range of services and facilities". No explanation is provided in the consultation document as to what a 'multi-purpose facility' is and why it is required as part of new development. The policy wording should be amended to make this clear. We are also unsure why the fourth paragraph has been included within this policy. How is a requirement to provide additional informal play, equipped play spaces and amenity green space related to the economy and employment provision? This part of the policy should be deleted as it does not appear appropriate as part of employment developments.	No changes required. NB - Policies Map to be updated should indicative line of HS2 be amended. HS2 provide such data as appropriate.	Regulation 19 consultation subsequent to the preferred options consultation, Draft plan available for consultation and explanatory text within the plan supports each policy. Preferred Options consultation document indicated area of new Green Belt in this location. Further evidence has led to the changes to the plan including the Strategic Gap policy. Local Plan 2040 identifies sufficient land to meet employment land requirements to 2040.
LP2040 375	Gary Stephens (Marons Planning) Bellway Homes Ltd	SP11	N/A	N/A	N/A	Yes	Yes	On the basis that the plan fails to meet the housing and employment requirement (including unmet needs) as set out in other representations, exceptional circumstances exist to release further land from the green belt. In addition to policy SP11 makes no reference to safeguarding land within the Green Belt. There is no reference to safeguarding land within the plan or supporting evidence. It is considered necessary for the plan to safeguard land in order to meet longer term development needs. The plan should be safeguarding land in order to ensure that there is a degree of permanence to the boundaries proposed within the plan and should be reflected within Policy SP11.	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base. Local Plan 2040 seeks to meet the established employment land requirements for the District.
LP2040 376	Gary Stephens (Marons Planning) Bellway Homes Ltd	SP12	N/A	N/A	No	Yes	Yes	The LHN does not take account of the requirement to address the need for affordable housing in the district. The proportion of circa 80% of the overall housing requirement will not be delivered based on the affordable housing contribution that can be captured on sites whilst the plan is viable nor will it meet the needs of the neighbouring authorities.  SP12 and the proposed allocation of SHA2 is not appropriate taking into account of reasonable alternatives. The council must demonstrate that it has examined fully all other reasonable alternative sites. SP12 is not effective as it is not deliverable over the plan period. Although Appendix A provides a trajectory for the delivery of housing across all sites, there is no breakdown for the trajectory for each allocation. There is a failure of SP12 to promote a sustainable pattern of development that seeks to meet the development needs of their area. The consequences will be unmet needs being met in less sustainable locations further away from where the need arises, particularly in the case of Tamworth whose urban area is bounded by Lichfield on three sides. SP12 should be revised to establish a housing requirement that takes account of economic factors and housing affordability to increase Lichfield's Local Housing Need above the Standard Method; and provides for a greater contribution towards unmet needs of the wider GBBCHMA, taking account of housing need up to 2040, in line with the Plan on a pro-rata basis. Policy SP12 should also recognise the role of Tamworth's urban edge in contributing to meeting the housing requirement over the Plan period, including unmet needs from neighbouring areas  There are more suitable sites for allocation. Policy SP12 should also be amended to include strategic allocations to the north and south west of Tamworth in respect of land promoted by Bellway Homes (Sites 370 and 376 from the SHLAA 2020) in order to contribute to meeting the revised housing requirement. This should either be in addition to SHA2, or in its place.	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.

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LP2040 377	Gary Stephens (Marons Planning) Bellway Homes Ltd	SP13	N/A	N/A	No	Yes	Yes	<p>SP13 is not positively prepared as it does not provide a strategy which is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and consistent with achieving sustainable development.</p> <p>The failure of SP13 to promote a sustainable pattern of development that seeks to: meet the development needs of the area, align growth and infrastructure and mitigate climate change renders it contrary to para 11a of the Framework</p> <p>There is a shortfall of circa 100,000 sq.m of floor space based on the existing supply identified in the Employment Land Availability Assessment. The availability supply of circa 250,000sqm there is little evidence to demonstrate its suitability to meet future needs in terms of geography and market attractiveness, and deliverability. By the way of example, there is limited availability of large sites along the A5 corridor around Tamworth to meet future needs in the area. The plan needs to allocated additional sites to provide some flexibility to ensure the economy is not stifled by a lack of suitable sites.</p> <p>SP13 makes provision for no employment land towards the black country's unmet needs. There is no agreement with the Black Country authorities that this is agreed in order to contribute to meeting their unmet needs of 210 ha of employment land to 2039. SP13 makes no provision for Tamworth's unmet need.</p> <p>SP13 and its strategy for distributing employment growth is not justified by the evidence.</p> <p>Further, Policy SP13 is not effective as it is not deliverable over the Plan period. Given the Plan's reliance on specific sites to make a significant contribution to meeting the employment need, evidence on the deliverability of sites should be provided to demonstrate the Plan is deliverable in accordance with the Framework.</p> <p>Site 78 should be considered as it is a suitable site.</p>	No changes required.	Local Plan 2040 identifies sufficient employment land to meet the District's employment land requirements. The plan, and supporting evidence, not there is limited land availability to deliver beyond those requirements and as such the council is not able to assist in meeting unmet employment land needs.
LP2040 378	Gary Stephens (Marons Planning) Bellway Homes Ltd	Sustainability Appraisal	N/A	No	N/A	Yes	Yes	<p>The proposed submission plan sustainability appraisal (currently SA) refers to testing that was undertaken through SA at the preferred options stage in January 2019 for different growth options and different spatial options. As a general point, the SA should provide all info in one document rather than requiring the reader to review different SA reports. The exercise should be repeated at each stage of the plan making process.</p> <p>In terms of spatial options, these were also subject to testing in the previous SA dated January 2019 but again have not been re-appraised in the current SA. It is noted that the January 2019 SA identified north and north-west Tamworth as a preferred strategic option for growth (para 8.1.43), and yet this is not reflected in the Plan. No reasons are given for the rejection of this option in the current SA, although it appears to be due to the fact that the SHLAA has assessed sites in this area as not suitable. That assessment is challenged in representations made to Policy SP1, as Site 370 (Land to the north of Coton Lane) is suitable when fairly assessed in the same way as other sites. Similarly, the SA has not considered other options around Tamworth even though it is at the second tier of the settlement hierarchy. The proposed submission plan SA therefore fails to consider all reasonable alternatives, or record its assessment of reasonable alternatives and reasons why they were rejected.</p> <p>The Sustainability Appraisal should be reviewed and updated to evaluate reasonable alternatives in respect of levels of growth (housing and employment) and the spatial strategy, in particular in respect of options around Tamworth.</p>	No changes required.	Local Plan 2040 has been supported by evidence including Sustainability Appraisal at all stages of plan progression. Lichfield District Council considers the Sustainability Appraisal to have been prepared in accordance with relevant regulations and guidance. Local Plan 2040 includes policies to ensure
LP2040 379	Philip Hart	Policy SP1, SP12, SHA1, F1-F4	No	No	No	No	No	Lack of liaison with local councils (Tamworth and Fazeley) and local community. Objections raised in 2019/2020 have been ignored. No one has contacted householders personally. Proposal does not comply with "Protect Green Belt Land". SHA2 is in the Green Belt, there is no justification for 800 homes here. Incomplete traffic assessment at Mile Oak. Plan is not positively prepared. There are alternative brownfield sites available within LDC area, insufficient evidence has been collected in respect of reasonable alternatives to SHA2. Traffic in Fazeley is already horrendous prior to the proposed development. Will impact on local services and facilities and school. Allocation of homes inappropriate e.g. Burntwood only 4% compared to 29% in smaller rural areas. People in the area don't use Lichfield services - Tamworth services are already under pressure. SHA2 will do nothing to protect or enhance natural or historic legacy. Biodiversity will be affected, increased risk of flooding, increased air pollution. Proposal does not meet the challenge of climate change.	No changes required.	appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to
LP3040 380	Alexander Child (The Planning Bureau), McCarthy and Stone and Churchill Retirement Living	H2	Yes	Yes	No	Yes	Yes	<p>The Lichfield District Local Plan 2040 (Regulation 19 Consultation) is one of an alarmingly limited number of emerging Local Plans that have set a differential affordable housing rate for; non-allocated previously developed land (20%); bespoke rates for the strategic sites ranging from 20% to 35%; non-allocated, non-strategic greenfield sites (35%); and non-allocated, strategic greenfield sites (20%). This is, of itself, highly commendable and suggests a greater focus on viability at the Plan making stage.</p> <p>A clause should therefore be included in Policy H2 which read as follows: I. Specialist older persons' housing including sheltered and extra care accommodation will not be required to provide an affordable housing contribution on previously developed land.</p> <p>Given the Council's stance towards developer contributions and affordable housing, we find aspects of the evidence base underpinning these policies to be concerning.</p> <p>Concerns that the viability assessment has overplayed the viability of older persons housing.</p>	No changes required	Support noted. Viability evidence has considered a range of typologies of development and has informed the policies within the Local Plan 2040.



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LP2040 381	Paul Harris (Cerde Planning) Daniel Sampson (Miller Homes)	Whole document	No	Yes	No	Yes	Yes	<p>Representations are on behalf of Miller Homes who promote the site known as 'Land at Lichfield Road, Burntwood'. Site represents an opportunity to deliver 300 new homes including up to 40% affordable homes in a sustainable location which aligns strongly with the councils stated, but not actioned, approach to follow the settlement hierarchy. Concern with the spatial strategy both in terms of the overall levels of housing growth and the distribution of homes within the district. Pressing need to deliver strategic housing growth in Burntwood to ensure enough homes are delivered in the district and HMA and also to ensure social infrastructure and services that the plan identifies are realised.</p> <p>Disagree with the Site Selection Paper 2019 assessment of the site, consider there to have been anomalies in respect of the assessment of the site and if these are corrected the site scores better than sites selected for allocation. Surprised the Site Selection Paper has not been updated following the publication of the Stage 2 Green Belt Review. Review makes a number of recommendations in respect of sites which should be taken forward for further consideration but only sites taken forward are those which were identified at the Preferred Options stage. Disagree with the Green Belt Review assessment of the site.</p> <p>Consider the duty to cooperate has not been met. Lichfield Local Plan seeks to meet some unmet need but does not explain how this has been arrived at nor does it seek to quantify the overall level of shortfall from the HMA. Concern that contribution toward unmet need is 1,835 homes lower than suggested at the Preferred Options stage and no detailed explanation has been provided as to this change.</p> <p>Mainstay of the plan is SHA1 which represents over 70% of the new allocations in the plan. Consider this to be a complex site and as such the trajectory of the plan to be unrealistic and not positively prepared. Strategy should be revisited to include a greater range of smaller and medium range sites which could ensure greater contribution to unmet needs and come forward in the early years of the plan.</p> <p>Plan is not positively prepared. Greatest concern is that despite being identified as a tier 2 settlement (the 2nd most sustainable) the strategy does not allocate any growth to Burntwood and by contrast tier 3 settlements will grow. Previous modest allocation of 400 homes to be determined through a neighbourhood plan has been deleted from the plan since Preferred Options without explanation along with safeguarded land. There is no justification for the spatial strategy not to allocate growth to Burntwood.</p> <p>Plan is not effective and there trajectory is based on unrealistic assumptions in respect of the delivery of sites. There is an overreliance on SHA1 which has accessibility issues.</p> <p>Suggest the plan needs to be modified to include allocations at Burntwood as the District's second most sustainable settlement. There is no explanation as to why no new homes are to be allocated at Burntwood in accordance with the settlement hierarchy.</p>	No changes required.	<p>A wide range of evidence base has been used when determining the spatial strategy and proposed allocations within the Local Plan 2040. The evidence base supporting the Local Plan 2040 is directly referenced within the explanatory text within the Local Plan 2040. The Site Selection Paper 2019 was prepared at the time of the assessment. Further evidence has been prepared and published in support of the Local Plan. The Local Plan 2040 seeks to deliver sufficient homes to meet the housing requirement of the plan in accordance with the spatial strategy.</p> <p>The District Council has worked with authorities across the GBBCHMA through the duty to cooperate. The Local Plan 2040 seeks to provide a significant contribution toward unmet need arising from with the HMA, this is in addition to unmet need which the District Council has provided for within its adopted Local Plan.</p>
LP2040 382	Georgina Kean (Turley) Redrow Homes	Section 13. Burntwood	Unanswered	No	No	Yes	Yes	<p>Redrow's site on land south of Highfields Road provides the most sustainable and deliverable residential opportunity at Burntwood and in addition to modification of the overarching spatial strategy to direct more housing growth to Burntwood, Redrow consider that land at Highfield Road, should be removed from the Green Belt and allocated for residential development to assist in meeting the needs of Burntwood throughout the Local Plan period.</p> <p>the suppression of housing growth at Burntwood and its location inset within the Green Belt, will further stifle the growth of the Town with limited options for windfall housing sites to come forward and meet the needs of the town later on in the plan period</p>	No changes required.	<p>A wide range of evidence base has been used when determining the spatial strategy and proposed allocations within the Local Plan 2040. The evidence base supporting the Local Plan 2040 is directly referenced within the explanatory text within the Local Plan 2040. The Site Selection Paper 2019 was prepared at the time of the assessment. Further evidence has been prepared and published in support of the Local Plan. The Local Plan 2040 seeks to deliver sufficient homes to meet the housing requirement of the plan in accordance with the spatial strategy.</p> <p>The District Council has worked with authorities across the GBBCHMA through the duty to cooperate. The Local Plan 2040 seeks to provide a significant contribution toward unmet need arising from with the HMA, this is in addition to unmet need which the District Council has provided for within its adopted Local Plan.</p>
LP2040 383	Simon Hawley (Harris Lamb) Jo Hess (Barratt West Midlands)	SHA1	Yes	Yes	No	Yes	Yes	<p>Number of significant concerns with allocation SHA1 principally linked to the fact there is limited supporting information regarding the deliverability of the site. Main concern is it is not clear how access will be gained to the site. Highway connection cannot feasibly be created in this location. It is not clear that a connection can be made from the allocation to the existing strategic development allocation. Not aware of any information relating to access points to the site.</p> <p>Clear the Council has not yet bottomed out what the impact of the proposed development will be on the highway network, nor do they have clear or costed access solution for the allocation that can be relied upon. Therefore have significant concerns with the suggestion that the site is capable of delivering the quantum of development proposed. There is not enough information about the sites accesses arrangements available for it to be concluded that the site is deliverable. Delivery of the site, given its scale, will be complex. It will be several years before the site starts to deliver housing - concern it will not enable the delivery of 2,200 dwellings within the plan period. Do not consider that Policy SHA1 is sound, it is not effective and will not deliver the requisite housing planned over the plan period.</p>	No changes required.	<p>Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.</p>
LP2040 384	Simon Hawley (Harris Lamb) Jo Hess (Barratt West Midlands)	Policy H1	Yes	Yes	No	Yes	Yes	<p>Agree with the objective of achieving a balanced housing market and delivering the right type and size of houses to meet housing need. Do not agree Policy H1 is not the correct way of achieving this as it is an incredibly blunt objective for developers to comply with. Policy does not take account of the geographical location of where housing is being proposed. Different locations will have different demographics. The policy does not take account of these different market areas and seeks to apply a one size fits all approach. This is not sound.</p> <p>The policy is not market facing, the market varies from place to place and as such there needs to be some flexibility in how the policy is applied. Objective should be to meet housing need across the District as a whole rather than each individual site.</p> <p>Adhering to a specific mix may present issues where sites are constrained or where specific design response is required in order to address a specific issue. Housing mix can inform this but should not dictate the type and form of a development. A rigid housing mix policy does not take account of the fact that demand and need for housing are going to change over time and at a much quicker rate than any review of a local plan. As such there is a risk the policy will not be able to keep up with these changes. Suggest that the exact proportions of house types/sizes is kept out of the policy and instead the policy refers to providing housing in accordance with the most up to date evidence of need.</p>	No changes required.	<p>Policy H1 is based upon up to date evidence within the HEDNA which details the housing mix required to meet the District's housing need based upon demographics. The policy provides flexibility within each type/size of house to ensure the policy is flexible.</p>
LP2040 385	Simon Hawley (Harris Lamb) Jo Hess (Barratt West Midlands)	Policy H2	Yes	Yes	No	Yes	Yes	<p>Support the Council seeking to secure affordable housing through the development process. Do not object to the requirement to deliver affordable housing but do object to how the policy is set up. Policy defines seven thresholds and requirements for when affordable housing would be sought or required. Policy would be improved if it was simplified into few categories so that it was clear when and how much housing would be sought in different situations. As written the policy is unduly complicated and risks not achieving what it intends to do.</p>	No changes required.	<p>Policy H2 is based upon up to date evidence within the HEDNA. This makes clear the affordable housing requirements for each scenario and is based on technical evidence.</p>
LP2040 386	Simon Hawley (Harris Lamb) Jo Hess (Barratt West Midlands)	Policy INF2	Yes	Yes	Yes	No	Yes	<p>Barratt are generally supportive of the requirement that new development should deliver new social and community infrastructure to support it. Clearly in order to do so, the Council should have a clear idea of what is needed so that it can work proactively with the developer to ensure that relevant needs are met.</p>	No changes required.	<p>Support noted.</p>
LP2040 387	Simon Hawley (Harris Lamb) Jo Hess (Barratt West Midlands)	Policy LT1	Yes	Yes	No	Yes	Yes	<p>The policy states that the Council will require appropriate provision to be made for off street parking in accordance with parking standards to be set out in supplementary planning documents. Barratt have no objection to the requirement to make available appropriate off street parking as this is fundamental to securing a well designed and laid out scheme. However, object to the deferral of the parking standards to be set within an SPD. An SPD does not have the same status as a development plan policy and are not subject to the same rigour as preparation of a Local Plan. This is not an effective or justified approach.</p>	No changes required.	<p>District Council considers it appropriate to set parking standards within supplementary planning documents. This is consistent with the District Council's current approach.</p>

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LP2040 388	Simon Hawley (Harris Lamb) Jo Hess (Barratt West Midlands)	Policy SP1	Yes	Yes	No	Yes	Yes	<p>Significant concerns with the proposed housing target. Consider that 500 dwelling per annum are required to meet Lichfield's housing requirement rather than the 321 Local Housing Need figure. The contribution toward unmet need from the GBBCHMA is woefully inadequate and has been informed by the 2020 Position Statement (PS) which is not a reliable evidence base document. Housing requirements within the PS have not been derived using the standard method or the previous OAN guidance. The PS does not look beyond 2031 and the Lichfield plan is being prepared to 2040. No proper assessment of shortfall for the last 9 years of the plan. The housing requirement in the PS does not reflect the housing requirements in adopted and emerging plans. PS assumes all allocations and urban supply are deliverable. PS fails to take account of the latest information produced for the Black Country Authorities which identifies a housing shortfall. PS doesn't take account of the updates LHN method which requires Birmingham and Wolverhampton to receive a 35% uplift.</p> <p>'Falling short' report concludes that the housing shortfall across the HMA to 2040 will be between 196,000 and 204,000 homes. As such there proposed contribution is between 1.35 and 1.3%. If shortfall is divided between 9 authorities within the HMA (not Birmingham or the Black Country) each authority would be required to deliver between 21,777 and 22,666 dwellings. Given Lichfield has significant areas of undeveloped land and abuts Lichfield and the Black Country it should make a significant contribution toward the housing shortfall.</p> <p>Significant failing of the Lichfield plan is that the shortfall has not been properly assessed. It is conceivable that the housing requirement for Lichfield is in excess of 30,000 dwellings.</p> <p>Spatial Strategy and proposed allocations will not be capable of delivering the housing requirement. The propose SUE to the north of Lichfield will not be deliverable over the plan period. Council should be looking to allocate a range of additional sites across the District. Should be a variety of sites to deliver housing in the short to medium term.</p> <p>Spatial Strategy conforms that changes to the Green Belt will be minimised. If the District is required to accommodate more housing for the conurbation it would be good plan making to direct developments to locations that are well located to the conurbation. This would mean directing development to the south of the District which would be more sustainable.</p>	No changes required.	Housing requirement within the Local Plan 2040 provides for the Local Housing Need (LHN) as established by the Standard Methodology and supported by evidence within the HEDNA. Local Plan 2040 provides contribution toward unmet needs arising from the GBBCHMA, contribution is considered to be appropriate and soundly based.
LP2040 389	Simon Hawley (Harris Lamb) Jo Hess (Barratt West Midlands)	Policy SP3	Yes	Yes	No	Yes	Yes	<p>Objection is not based on electric vehicle charging points per se, more around the actual installation and choice of connection point. EV's are still in their relative infancy, there is no industry standardisation over how EV's are charged. This means different vehicles can be charged at different rates and different manufacturers use different charger connections. In light of this suggest that instead of installing the connection point in every new dwelling the requirement should be for the infrastructure and wiring to facilitate a connection be provided.</p>	No changes required.	Policy seeks to ensure appropriate charging points for electric vehicles are provided within new development. Policy is considered appropriately flexible to allow for appropriate connections to be provided.
LP2040 390	Simon Hawley (Harris Lamb) Jo Hess (Barratt West Midlands)	Policy SP11	Yes	Yes	No	Yes	Yes	<p>Consider there is a need to release more land for housing to meet the needs of the District and unmet needs of the conurbation. Our view is that additional housing allocations should be made to the south of the District given that this part of the District contains some of the largest and most sustainable settlements. it is also closest to the conurbation where a large proportion of the housing requirement arises from. This is a more sustainable approach than directing growth to the north of the District outside of the Green Belt. The allocation of land for development in the southern part of the District would necessitate land being removed from the Green belt.</p>	Not changes required	Housing requirement within the Local Plan 2040 provides for the Local Housing Need (LHN) as established by the Standard Methodology and supported by evidence within the HEDNA. Local Plan 2040 provides contribution toward unmet needs arising from the GBBCHMA, contribution is considered to be appropriate and soundly based.
LP2040 391	Simon Hawley (Harris Lamb) Jo Hess (Barratt West Midlands)	Policy SP12	Yes	Yes	No	Yes	Yes	<p>Concerned about the Council's proposal to step up the housing requirement from 320 dpa in the years to 2027 up to 525 dpa from 2027-2040. The supporting text at paragraph 4.21 indicates that in light of the latest Position Statement there is going to be an emerging shortfall in the Black Country from 2027/28. We disagree and consider the findings of the Position Statement to be flawed. We believe there is a shortfall in the period up to 2031 and it would be remiss of the Council to seek to delay delivery of new housing that would seek to address it. Do not consider the decision to delay the delivery of housing to be sound on the basis the approach cannot be justified on proportionate evidence.</p>	No changes required.	Housing requirement within the Local Plan 2040 provides for the Local Housing Need (LHN) as established by the Standard Methodology and supported by evidence within the HEDNA. Local Plan 2040 provides contribution toward unmet needs arising from the GBBCHMA, contribution is considered to be appropriate and soundly based.
LP2040 392	Simon Hawley (Harris Lamb) Jo Hess (Barratt West Midlands)	Policy SP15	Yes	Yes	No	Yes	Yes	<p>Welcome the inclusion of policy SP15 and consider that the protection and maintenance of both natural resources and biodiversity is a key issue. The need to achieving biodiversity net gain ("BNG") has been established in planning policy since the publication of the 2019 Framework. The soon to be enacted Environment Bill will also bring into law the need to achieve BNG. Barratt are keen to develop and incorporate BNG as a key component of their sites going forward. The policy should specify 10% BNG is required in accordance with the Act.</p>	No changes required.	Local Plan 2040 includes policies which require biodiversity net gain. These policies will be consistent with legislation.
LP2040 393	Simon Hawley (Harris Lamb) Jo Hess (Barratt West Midlands)	Objective 1	Yes	Yes	No	Yes	Yes	<p>Objective 1 advises that housing development will be directed 'principally' toward an urban extension to the north of Lichfield City. Have concerns over the soundness of directing a significant proportion of the housing requirement to a single site. Agree with the principal of directing significant growth to the most sustainable locations, we have concerns about the deliverability and build-out rate associated with the proposed allocation. Furthermore, if the site does not deliver as expected the Plan's housing strategy will fail. The housing requirement proposed by the draft plan is inadequate and unjustifiable. The objective of focusing new development on larger settlements outside of the Green Belt is not going to be a deliverable option if a higher level of development has to be accommodated.</p>	No change required.	The District Council considers the proposed allocations within the plan to be deliverable and soundly based. The District Council has taken a cautious approach to the delivery of development from SHA1 within the plan period.
LP2040 394	Simon Hawley (Harris Lamb) Jo Hess (Barratt West Midlands)	Vision	Yes	Yes	No	Yes	Yes	<p>The Plan's vision is not ambitious or aspirational. The vision is largely silent on addressing existing and emerging deficiencies. For example the plan notes the District is characterised by a larger than average proportion of older people and a smaller working age population. that being the case in order for the economy to grow the size of the working population needs to grow. A sufficient amount of housing should be provided for people moving into the District for work to fill these jobs. The vision does not seek to address issues of housing affordability. 64% of the plan's housing requirement is affordable. however, due to viability constraints the affordable housing requirement is set between 20% and 35%. As such there will be a shortfall in affordable housing provision.</p>	No change required.	Housing requirement is based upon Local Housing Need and seeks to deliver homes to meet the District's housing need which takes account of local demographics. Local Plan 2040 includes policy to provide the maximum level of affordable homes whilst ensuring development is viable.
LP2040 395	Simon Hawley (Harris Lamb) Jo Hess (Barratt West Midlands)	Vision for Whittington	Yes	Yes	No	Yes	Yes	<p>The vision for Whittington advises that the village will accommodate a proportionate level of growth that reflects the existing character and qualities of the village and which addresses local needs. The plan makes an allocation to the west of the settlement demonstrating that Whittington is a sustainable location for development. Support the recognition that Whittington has a range of services and facilities and is a sustainable location for development but consider the level of housing directed to the village as inadequate. There needs to be a significant uplift in the Plan's housing requirement and a reduced reliance placed upon the North of Lichfield (SHA1) allocation. Additional housing allocation(s) should be made at Whittington. Land at Sheep wash Farm should be the preferred location for an allocation at Whittington. The land to the east of Whittington makes a very limited contribution to the Green Belt. Site provides the opportunity to introduce significant areas of public open space and improve the canal. Provides the opportunity to provide high quality residential accommodation in close proximity to Whittington's services and facilities.</p>	No change required.	Local Plan 2040 proposes sufficient land allocations to meet the housing requirement set out within the plan. The selection of allocations has been based upon consideration of the extensive evidence base which supports the Local Plan.
LP2040 396	Chonetell Buchanan (First City) on behalf of Mr Mears & Mrs Jackson	Policy SP12	No	Yes	No	Yes	Yes	<p>level of housing proposed to 2040 is significantly lower than what is needed both for the District and with consideration to the GBBCHMA. Consider the housing figure should be increased to 15,500. Increased housing will require additional allocations. This should be directed to the most sustainable locations within the District. Burntwood should be allocated residential development. We do not consider the level of housing and the proposed locations of housing to be positively prepared. Require further rationale to understand the Council's lack of allocations within Burntwood. Replying on brownfield land within Burntwood is not proportionate and ineffective. Proposes site to the south of Highfields Road. Burntwood for development. Council need to ensure Local Plan aligns with 2021 NPPF.</p>	No change required.	Local Plan 2040 proposes sufficient land allocations to meet the housing requirement set out within the plan. The selection of allocations has been based upon consideration of the extensive evidence base which supports the Local Plan.
LP2040 397	Chonetell Buchanan (First City) on behalf of Mr Mears & Mrs Jackson	Policy H1	Unanswered	Yes	No	Yes	Yes	<p>Delivery of housing is a key aim and the need for a level of flexibility factored in and acknowledged by the policy (market demand and financial viability) ensures delivery will not be put at risk. Broadly support the sentiment of the policy in regards to delivery of a balanced housing market. However, there is a requirement for a level of flexibility to be considered on all further developments to ensure there is a level of individuality achieved with the aim of created well designed homes to meet the needs of different groups in the community. A very limited amount of housing has been allocated in the second most sustainable settlement and therefore consider an opportunity has been overlooked to allocated additional residential sites at Burntwood. There has been a shift in living habits since the pandemic with people looking for properties with more space and larger outdoor private amenity space. Promotes site to the south of Highfields Road.</p>	No change required.	Local Plan 2040 proposes sufficient land allocations to meet the housing requirement set out within the plan. The selection of allocations has been based upon consideration of the extensive evidence base which supports the Local Plan.

Representation Ref (LP2040 X).	Consultee/Agent	Section	Duty to Cooperate	Legally and procedurally Compliant?	Is the plan sound? (inclusive of positively prepared, justified, effective and compliance with NPPF)	Does the respondent suggest changes	Does the respondent wish to appear at EIP	Comment Summary	Changes Required	Officer Response
LP2040 398	Chonetell Buchanan (First City) on behalf of Mr Mears & Mrs Jackson	Policy B1 & B2	No	Yes	No	Yes	Yes	Burntwood is the second largest settlement in the District and functions as one of the District's key employment locations. Plan is unsound as it doesn't direct the appropriate level of growth to the second most sustainable settlement especially where there is a current and anticipated housing shortfall in the GBBCHMA. Appropriate levels should be significantly greater than 4%, especially when considered against other settlements which despite being smaller and less sustainable have a significantly higher combined allocation of housing. Consider in order for the plan to comply with the duty to cooperate that a greater level of housing should be directed to Burntwood. Plan is not positively prepared as Burntwood has no new housing allocations or safeguarded land. There is a heavy reliance on Brownfield land in Burntwood therefore the plan is not justified. Promotes site to the south of Highfields Road, Burntwood.	No change required.	Local Plan 2040 proposes sufficient land allocations to meet the housing requirement set out within the plan. The selection of allocations has been based upon consideration of the extensive evidence base which supports the Local Plan.
LP2040 399	Chonetell Buchanan (First City) on behalf of Mr Mears & Mrs Jackson	Policy SP1	No	Yes	No	Yes	Yes	Broadly support the sentiment of Policy SP1 in regards to the accommodation of housing to meet the needs arising from the GBBCHMA however consider insufficient amount has been allocated, Updated Position Statement 2020 identifies that the Black Country has evidenced significant shortfall through its 2019 urban capacity review. Important to also note the impacts of the Coronavirus pandemic. It has had an impact on the delivery of housing. It has also led to a shift in habits with people looking for properties with more space and larger outdoor private amenity space and home working space. Consider additional attention should be given to the post 2030 shortfall expected within the HMA.	No change required.	Local Plan 20401 proposes to provide 2665 dwellings to meet unmet needs from the GBBCHMA with 2000 towards the shortfall arising from the Black Country. This is in addition to unmet need provided in the adopted local plan.
LP2040 400	Chonetell Buchanan (First City) on behalf of Mr Mears & Mrs Jackson	Policy SP12	No	Yes	No	Yes	Yes	Very special circumstances to justify the removal of land from the Green Belt around Fazeley and Whittington have not been justified. If land is removed from the Green Belt it should be located in the most sustainable locations in order to meet current needs and plan appropriately for the future. Burntwood being a level 2 settlement should be considered the most sustainable and appropriate location for future development. Additional attention should be given to the post 2030 shortfall expected in the HMA. Due to the nature of the District it is most likely to accommodate the housing need by land being removed from the Green Belt in the most sustainable development. Do not consider the Councils reasons for the lack of new allocations within Burntwood has been justified. Burntwood is accommodating only 4% if growth with smaller settlements accommodating 29%. Promoted site to the south of Highfields Road, Burntwood. Disagree with the assessment of the site within the Green Belt Review. Do not consider sufficient housing and in the correct locations has been planned for it ensure the plan is effective in the delivering the needs of the District and GBBCHMA in the most sustainable and appropriate locations.	No change required.	Local Plan 20401 proposes to provide 2665 dwellings to meet unmet needs from the GBBCHMA with 2000 towards the shortfall arising from the Black Country. This is in addition to unmet need provided in the adopted local plan. Green Belt Review has been undertaken using a methodology considered to be sound and based upon best practice.
LP2040 401	Chonetell Buchanan (First City) on behalf of Mr Mears & Mrs Jackson	Paragraph 3.7	Unanswered	Unanswered	No	Yes	Yes	Acknowledges the limited supply of development sites within the existing urban area including brownfield sites and therefore the Council are seeking to make the best use of what remains. Consider the lack of provision of additional land to accommodate the needs of Burntwood as part of the overall strategy for the District is short sited and not positively prepared due to the identified housing shortage within the GBHMA. No allocations proposed outside of the urban area which could meet the housing needs of the settlement and provide flexibility and reasonable alternatives should sites within the settlement fail to deliver as expected. Consider the land south of Highfields Road should be allocated to provide flexibility. Increased development within the area will attract additional investment to enable improvements including town centre facilities and serve the resident communities and existing social and infrastructure.	No change required.	Local Plan 20401 proposes to provide 2665 dwellings to meet unmet needs from the GBBCHMA with 2000 towards the shortfall arising from the Black Country. This is in addition to unmet need provided in the adopted local plan.
LP2040 402	Chonetell Buchanan (First City) on behalf of Mr Mears & Mrs Jackson	Vision	No	Yes	No	Yes	Yes	Vision states that the largest settlements will continue to play the most significant role in enabling the District to grow. Do not consider this statement aligns with policies within the plan in relation to Burntwood. The settlement hierarchy indicates Burntwood as a Tier 2 settlement. Given its position we do not consider the level of development directed to Burntwood is appropriate or in accordance with the strategy. Burntwood is allocated approximately 4% of the residential growth. Consider additional growth should be directed towards Burntwood to help meet the needs of the District and the wider GBHMA. There will be a significant shortfall post 2031 and it would be prudent to plan appropriately for this. Insufficient land or safeguarded land identified.	No change required.	Local Plan 20401 proposes to provide 2665 dwellings to meet unmet needs from the GBBCHMA with 2000 towards the shortfall arising from the Black Country. This is in addition to unmet need provided in the adopted local plan.
LP2040 403	Simon Hawley (Harris Lamb) Martin Marais (David Wilson Homes)	Policy SP12	Yes	Yes	No	Yes	Yes	Concerned about the Council's proposal to step up the housing requirement from 320 dpa in the years to 2027 up to 525 dpa from 2027-2040. The supporting text at paragraph 4.21 indicates that in light of the latest Position Statement there is going to be an emerging shortfall in the Black Country from 2027/28. We disagree and consider the findings of the Position Statement to be flawed. We believe there is a shortfall in the period up to 2031 and it would be remiss of the Council to seek to delay delivery of new housing that would seek to address it. Do not consider the decision to delay the delivery of housing to be sound on the basis the approach cannot be justified on proportionate evidence.	No change required.	Housing requirement within the Local Plan 2040 provides for the Local Housing Need (LHN) as established by the Standard Methodology and supported by evidence within the HEDNA. Local Plan 2040 provides contribution toward unmet needs arising from the GBBCHMA, contribution is considered to be appropriate and soundly based.
LP2040 404	Simon Hawley (Harris Lamb) Martin Marais (David Wilson Homes)	Policy SP15	Yes	Yes	No	Yes	Yes	Welcome the inclusion of policy SP15 and consider that the protection and maintenance of both natural resources and biodiversity is a key issue. The need to achieving biodiversity net gain ("BNG") has been established in planning policy since the publication of the 2019 Framework. The soon to be enacted Environment Bill will also bring into law the need to achieve BNG. Barratt are keen to develop and incorporate BNG as a key component of their sites going forward. The policy should specify 10% BNG is required in accordance with the Act.	No changes required.	Local Plan 2040 includes policies which require biodiversity net gain. These policies will be consistent with legislation.
LP2040 405	Simon Hawley (Harris Lamb) Martin Marais (David Wilson Homes)	Objective 1	Yes	Yes	No	Yes	Yes	Objective 1 advises that housing development will be directed 'principally' toward an urban extension to the north of Lichfield City. Have concerns over the soundness of directing a significant proportion of the housing requirement to a single site. Agree with the principal of directing significant growth to the most sustainable locations, we have concerns about the deliverability and build-out rate associated with the proposed allocation. Furthermore, if the site does not deliver as expected the Plan's housing strategy will fail. The housing requirement proposed by the draft plan is inadequate and unjustifiable. The objective of focusing new development on larger settlements outside of the Green Belt is not going to be a deliverable option if a higher level of development has to be accommodated.	No change required.	The District Council considers the proposed allocations within the plan to be deliverable and soundly based. The District Council has taken a cautious approach to the delivery of development from SHA1 within the plan period.
LP2040 406	Simon Hawley (Harris Lamb) Martin Marais (David Wilson Homes)	Vision for the District	Yes	Yes	No	Yes	Yes	The Plan's vision is not ambitious or aspirational. The vision is largely silent on addressing existing and emerging deficiencies. For example the plan notes the District is characterised by a larger than average proportion of older people and a smaller working age population, that being the case in order for the economy to grow the size of the working population needs to grow. A sufficient amount of housing should be provided for people moving into the District for work to fill these jobs. The vision does not seek to address issues of housing affordability. 64% of the plan's housing requirement is affordable, however, due to viability constraints the affordable housing requirement is set between 20% and 35%. As such there will be a shortfall in affordable housing provision.	No change required.	Housing requirement is based upon Local Housing Need and seeks to deliver homes to meet the District's housing need which takes account of local demographics. Local Plan 2040 includes policy to provide the maximum level of affordable homes whilst ensuring development is viable.
LP2040 407	Simon Hawley (Harris Lamb) Martin Marais (David Wilson Homes)	Vision for Stonnall	Yes	Yes	No	Yes	Yes	Object to the vision for Stonnall which states the village will remain a small rural village that meets the needs of its residents. The spatial strategy is flawed and additional housing should be provided. The District should consider a greater range of sites and locations, especially where development is intended to meet the needs of Birmingham and the Black Country. It is good plan making to direct new housing closest to where it is needed. Stonnall is well related and would provide easy access to Aldridge, Walsall and the wider Birmingham area. Promotes site for 450 homes at Stonnall. Consider there are a number of benefits the site can deliver, which coupled with concerns over the deliverability of the Council's spatial strategy we object to the omission of an allocation at Stonnall on the basis that such an approach is not effective in delivering housing need.	No change required.	Housing requirement is based upon Local Housing Need and seeks to deliver homes to meet the District's housing need which takes account of local demographics. Consider the spatial strategy and proposed allocations identified are appropriate to deliver the housing requirement set out within the plan.
LP2040 408	Georgina Kean (Turley) Redrow Homes	Para 1.1	Unanswered	Unanswered	Unanswered, no, no	Yes	Yes	Para 1.1 of the draft LP confirms that the plan period covers the period to 2040. Redrow supports the plan period to 2040, but wishes to highlight that critical to this extended plan period will be active and ongoing co-operation between the local authorities forming the greater Birmingham and Black Country Housing Market Area in order to meet the unmet housing need.	No changes required	Supported noted. Plan period looks beyond the recommended 15 year period within the NPPF.
LP2040 409	Georgina Kean (Turley) Redrow Homes	Para 2.4	Unanswered	Unanswered	Unanswered	Yes	Yes	Burntwood as the second largest settlement in the district requires a sufficient scale and type of residential development.	No changes required	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.
LP2040 410	Georgina Kean (Turley) Redrow Homes	Para 2.8	Unanswered	Unanswered	Unanswered, no, no	Yes	Yes	House prices across the district on average are £70,000 more in Lichfield than in the West Midlands. Burntwood made up 23% of the districts residential sales between 2011 and 2020 with an average sale prices of almost £183,835 compared to the district average of almost £259,442. The town has played an invaluable role in offering low cost housing in the district which has experienced worsened levels of affordability. It is consider that greater level of growth must be allocated to Burntwood in the period to 2040 to maintain and enhance adorability.	No changes required	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.



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LP2040 411	Georgina Kean (Turley) Redrow Homes	Para 3.3	Unanswered	Unanswered	Unanswered, no, no		Yes	Redrow support the seven key issues for Lichfield District which align with the principles of plan making identified in para 16 of the NPPF.	No changes required	Support noted.
LP2040 412	Georgina Kean (Turley) Redrow Homes	H1	Unanswered	Unanswered	Unanswered, no, no		Yes	The affordability of housing in Lichfield has worsened and migration into the district has recently increased, surpassing the level allowed for in the demographic baseline of the standard method - which consequently undermines the size of the districts population. Redrow consider that Policy H1 of the local plan is justified insofar as it recognises the importance of providing a balanced housing market through mix of sizes, types, tenures and values whilst optimising density. Redrow consider the references within Policy H1 to the final housing mix being subject to further negotiation between the applicant and the district council during the application stage justified in demographics and market signals.	No changes required	Support noted. Policy H1 provides flexibility within the required housing mix to ensure the policy can respond to development proposals.
LP2040 413	Georgina Kean (Turley) Redrow Homes	SP1	Unanswered	Unanswered	Unanswered, no, no		Yes	<p>There is a greater local need for housing in Lichfield alone, beyond the minimum generated by the standard method. While the Council commissioned the HEDNA to examine the need to depart from the standard method, it exclusively considered the relationship with future job growth and fails to take account of both past delivery and previous assessments of need. Previous assessments of housing need have consistently indicated that between 410 and 450 dwellings per annum are needed in Lichfield. No evidence to suggest that the level of need in Lichfield District has fallen since January 2015. There is a question of realism of the 22-29% reduction in local need that is implied by the standard method figure of 321 dwellings per annum. Lichfield regularly saw more than 500 homes delivered annually prior to the last recession. The HEDNA does not adequately justify its preference for the Oxford Economics forecast, nor its decision for not considering other alternatives. There are two key reasons why the BDP shortfall figure should no longer represent the principle target for emerging local plans - changes to the national planning policy and guidance on how housing need should be calculated have been brought into force, the 37,900 figure is the city's shortfall as opposed to the unmet need across the whole HMA. There is an immediate and urgent need for HMA authorities to produce up to date position statement in order to provide a sound assessment of the HMA. There needs to be a consensus on how the shortfall will be distributed. Redrow consider that the strategic objectives should be expanded to specifically reference LDC's commitment to making a proportionate contribution towards GBBCHEMA housing shortfall.</p> <p>The housing requirement should be extracted and presented in a stand alone policy and presented as a policy entitled as 'housing requirement' the housing requirement is a growth target and the spatial strategy is about how development will be delivered. SP13 is a stand alone policy for employment so it is unclear why the housing requirement does not benefit from a stand alone policy.</p> <p>The housing requirement is a reduction on the proposed preferred options local plan. The HEDNA is not considered to be justified or consistent with national policy.</p> <p>HEDNA fails to take account of both past delivery and previous assessment of need, previous assessment of housing need have consistently indicated that between 410 and 450 dwellings per annum are needed in Lichfield.</p> <p>The overall housing requirement is only meeting Lichfield's needs.</p>	No changes required	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.
LP2040 414	Georgina Kean (Turley) Redrow Homes	SP11	Unanswered	Unanswered			Yes	<p>Neither policy nor the supporting text adequately express the exceptional circumstances for removing land from the green belt. It is critical for the soundness of the LPR to precisely define all the relevant factors which establish exceptional circumstances for removing land from the green belt.</p> <p>Whilst Policy SP1 confirms that non-strategic changes to the Green Belt to meet local needs may be made around smaller settlements within the District through the neighbourhood planning process, through net completions and existing committed supply, the limited level of growth directed to Burntwood through Policy SP12 has effectively already been met. As such the LP's omission of any Green Belt release / safeguarded sites at Burntwood fails to plan positively for the future of Burntwood and is not consistent with the NPPF as for any growth to be accommodated at Burntwood in the future, the Green Belt boundaries will need to be reviewed. To ensure the LP is justified and consistent with national policy it should allocate additional growth to Burntwood through the release of the most sustainable sites from the Green Belt to assist in meeting the needs of Burntwood throughout the plan period.</p>	No changes required	Local Plan 2040 explanatory text sets out that exceptional circumstances exist which are required for Green Belt boundaries to be changed. Green Belt Review supports the Local Plan 2040. Safeguarded land is not considered to be required within the Local Plan 2040, particularly given Governments stated intent to introduce new planning system.
LP2040 415	Mr and Mrs Burnett-Rogers	SHA2	Not answered	Not answered	Not answered	Not answered	Yes	Object to the proposals for a strategic allocation for 800 homes on land to the west of Fazeley, Mile Oak and Bonehill, Policy SHA2. Do not consider that LP2040 is sound nor has it been positively prepared, justified, effective nor consistent with national policy. Consider it is contrary to Paragraph 1.9, consider that the issue of transport has not been fully prepared or justified and is premature to include SHA2 in LP2040. Not evidenced or justified that SHA2 will be able to overcome its impact on the locality and ensure it is sustainable development. Consider it is contrary to section 7.38 ensuring no negative impacts on air quality and improvements to existing sustainable transport. SHA2 is bounded by single carriageway roads which are already at capacity. The volume of traffic using Drayton Manor Park and other retail and recreation options, changes to the junction at Carroway Head, emergency vehicles going to Good Hope Hospital, is already heavy and future disruption due to the construction of HS2. The impact of additional traffic has not been fully assessed. The creation of new pavements will require established hedges to be removed, there will be impact on historic and Listed bridges due to increased traffic. Existing footpaths discourage walking, are not suitable for wheelchair users, no pedestrian crossings on the A453, would be dangerous to cyclists and add to air and noise pollution which is already poor and further assessment is required. It is premature to include SHA2 within LP2040 when transport modelling work has not been undertaken as it has not been justified that the impact on the local road network from SHA2 will be acceptable. Sustainability - do not agree SHA2 is consistent with para 4.24 of LP2040 and remains inappropriate housing development and disproportionate to the settlement of Mile Oak. Conjoining Mile Oak with Bonehill and Fazeley to create a larger rural settlement does not disguise or lessen its impact as they are 3 distinct and separate areas and its unacceptable to conjoin these areas to justify the scale and size of SHA2. No evidence to support joining up these areas and rural village settlement created by LDC is for their own purposes and agenda, not to the benefit of existing residents of Mile Oak. Not consistent with Policy SP10 as SHA2 will not protect the amenities of existing residents, not of a scale or nature appropriate to its location, not reusing previously developed land, not in a sustainable location reducing the need for future residents to travel, not evidenced to prevent flood risk, will not sustain or improve air quality, is not protecting or enhancing biodiversity, geodiversity etc. Building on green belt sites will not reduce the need for future residents to travel. Education and football pitches on site or adjacent, neighbourhood centre and community hub needs to be provided. SHA2 is another development taking place on the boundary of Tamworth in a non sustainable location. It is Tamworth, not Lichfield which will ultimately have the burden of the impacts. reference to Sutton Lane - is this Sutton Road? Flood Risk - Policy SHA2 and IDP para 7.38 identify requirements to enable the development, section 10.4 of the Level 2 SFRA, Oct 2020 made recommendations in relation to flood risk, no detailed fluvial modelling for the site and therefore Flood Zone 2 has been used as a conservative indication of flood risk from climate change, flood zone 2 does not encroach the site but climate change could increase the chance of flooding on the southern boundary where the site is close to flood Zone 3. The current Flood Zone is misaligned with the Bourne Brook Cut and further site investigation should be carried out to assess potential for drainage by infiltration. Therefore consider that SHA2 not been fully prepared and justified and LP2040 is not sound as fundamental evidence of flood risk has not been undertaken and presumptions have been made.	No changes required	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.

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LP2040 415	Ben Burnett Rogers	SHA2	Unanswered	Unanswered	unanswered	Yes	No	Object to proposals at SHA2. Fundamental evidence is yet to be undertaken and other evidence ignored. Not evidenced or justified that SHA2 will be able to provide a transport package to overcome impact on locality to ensure sustainable development. The impact n traffic has not been fully considered with missing data. Traffic a major issue in the area that has a negative impact on existing residents. Modelling work should be undertaken while Drayton Manor Park is fully open. Development is inappropriate and disproportionate to the settlement of Mile Oak. SHA2 does not meet requirements of SP10. SHA2 has made reference to Sutton Lane and presume LDC mean Sutton Road. Flooding is a risk to the site and to the surrounding area, and development has potential to worsen this - considerations need to be in place fundamental evidence is missing.		Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. SHA2 was included within the Preferred Options document. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.
LP2040 416	Georgina Kean (Turley) Redrow Homes	SP12	Unanswered	Unanswered	Unanswered, no,no	Yes	Yes	There is a greater local need for housing in Lichfield alone, beyond the minimum generated by the standard method. While the Council commissioned the HEDNA to examine the need to depart from the standard method, it exclusively considered the relationship with future job growth and fails to take account of both past delivery and previous assessments of need. Previous assessments of housing need have consistently indicated that between 410 and 450 dwellings per annum are needed in Lichfield. No evidence to suggest that the level of need in Lichfield District has fallen since January 2015. There is a question of realism of the 22-29% reduction in local need that is implied by the standard method figure of 321 dwellings per annum. Lichfield regularly saw more than 500 homes delivered annually prior to the last recession. The HEDNA does not adequately justify its preference for the Oxford Economics forecast, nor its decision for not considering other. alternatives. There are two key reasons why the BDP shortfall figure should no longer represent the principle target for emerging local plans - changes to the national planning policy and guidance on how housing need should be calculated have been brought into force, the 37,900 figure is the city's shortfall as opposed to the unmet need across the whole HMA. There is an immediate and urgent need for HMA authorities to produce up to date position statement in order to provide a sound assessment of the HMA. There needs to be a consensus on how the shortfall will be distributed. The distribution of development of development is not fair. Since 2011 Burntwood's population has only grown by 245 people which equates to 0.8%. The working age population has shrunk by 6%. The draft Lap will not enable the sustainable growth of the Districts second largest settlement and so is not sound because it is not positively prepared, justified or consistent with national policy. Land South of Highfields Road Burntwood should be allocated as safeguarded land as a previously assessed site by LD as sustainable and deliverable. Whilst Policy SP1 confirms that non-strategic changes to the Green Belt to meet local needs may be made around smaller settlements within the District through the neighbourhood planning process, through net completions and existing committed supply, the limited level of growth directed to Burntwood through Policy SP12 has effectively already been met. As such the LP's omission of any Green Belt release / safeguarded sites at Burntwood fails to plan positively for the future of Burntwood and is not consistent with the NPPF as for any growth to be accommodated at Burntwood in the future, the Green Belt boundaries will need to be reviewed. To ensure the LP is justified and consistent with national policy it should allocate additional growth to Burntwood through the release of the most sustainable sites from the Green Belt to assist in meeting the needs of Burntwood throughout the plan period. The stepped housing trajectory is not positively prepared. The increased housing requirement will require additional allocations in SP12, an additional 2,200 dwellings should be added to meet the housing requirement of at least 2,200 dwellings.	No changes required	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.
LP2040 417	Richborough Estates - Richard Lomas	Whole Plan	Yes	Yes	No	Yes	Yes	Strategic Housing Allocation (SHA2) - Green Belt - does not agree with paragraph 4.24 of LP2040. SHA2 remains inappropriate housing development and disproportionate to the settlement of Mile Oak. To conjoin Mile Oak with the adjacent separate areas of Bonehill and Fazeley to create a larger "rural village settlement" does not disguise nor lessen its impact. Mile Oak, Bonehill and Fazeley are three distinct, separate areas, unacceptable to conjoin these areas in an attempt to justify the size and scale of SHA2, no evidence to support the joining up of these areas. This "rural village settlement" newly created by Lichfield District Council (LDC) is for their own purposes and agenda, not to the benefit of existing residents of Mile Oak. Not consistent with Policy SP10 as SHA2 will not protect the amenities of existing Mile Oak residents; is not of scale or nature appropriate to its location; is not reusing previously developed land; is not in a sustainable location reducing the need impact of additional traffic has not been fully assessed. The creation of new pavements will require established hedges to be removed, there will be impact on historic and Listed bridges due to increased traffic. Existing footpaths discourage walking, are not suitable for wheelchair users, no pedestrian crossings on the A453, would be dangerous to cyclists and add to air and noise pollution which is already poor and further assessment is required. It is premature to include SHA2 within LP2040 when transport modelling work has not been undertaken as it has not been justified that the impact on the local road network from SHA2 will be acceptable. Sustainability - do not agree SHA2 is consistent with para 4.24 of LP2040 and remains inappropriate housing development and disproportionate to the settlement of Mile Oak. Conjoini	No changes required.	Local Plan 2040 proposes to provide 2665 dwellings to meet unmet needs from the GBBCHMA with 2000 towards the shortfall arising from the Black Country. This is in addition to unmet need provided in the adopted local plan.
LP2040 418	Kathryn Simmonite (Highways England)	Whole Document	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	The sites (North of Lichfield & Fradley) are of a large scale and given their location can be expected to generate a significant number of trips impacting upon the strategic road network (SRN). It is possible these sites will require mitigation works which is indicated in Strategic Policy 4. Need to consider the wider impacts on the SRN. Site at Mile Oak is of large scale and located near to elements of the A5 Mile Oak junction. Careful consideration will need to be made of access/egress points and suitable transport analysis and assessments will be required.	No changes required	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.
LP2040 419	Georgina Kean (Turley) Redrow Homes	Para 3.10	Unanswered	No	No, No, No	Yes	Yes	Redrow consider that the Strategic Objectives and Priorities should be expanded to specifically reference LDC's commitment to making a proportionate contribution towards the GBBCHMA housing shortfall.	No changes required	Wording of objective in relation to housing requirement/need is considered appropriate.
LP2040 420	Georgina Kean (Turley) Redrow Homes	Para 3.9	Unanswered	No	No, No, No	Yes	Yes	Redrow consider that the Strategic Objectives and Priorities should be expanded to specifically reference LDC's commitment to making a proportionate contribution towards the GBBCHMA housing shortfall.	No changes required	Wording of objective in relation to housing requirement/need is considered appropriate.
LP2040 421	Richborough Estates - Richard Lomas	Whole Plan	Yes	Yes	No	Yes	Yes	Strategic Housing Allocation (SHA2) - Green Belt - do not agree with SP1, SP11 and paragraph 7.24 relating to changes to the green belt at Fazeley and consider these statements to be incorrect and misleading. We do not consider that SHA2 has been fully prepared and justified nor is the LP2040 sound. there are a number of SHLAA sites within the vicinity (west of Bonehill and south of Manor Road, Mile Oak) which are determined as "not likely to harm" which were also recommended to be taken forward for further consideration. Why have sites which are not deemed to harm the green belt not being pursued whereas SHA2 which is likely to harm the green belt is? It should also be noted that SHA2 is not fully within the "village settlement boundary". " It is not clear from the current consultation as to what 'exceptional' circumstances have occurred to determine that the Green belt boundaries at this location should be altered. The GBR at paragraph 5.11, states "When determining if exceptional circumstances exist which impact of additional traffic has not been fully assessed. The creation of new pavements will require established hedges to be removed, there will be impact on historic and Listed bridges due to increased traffic. Existing footpaths discourage walking, are not suitable for wheelchair users, no pedestrian crossings on the A453, would be dangerous to cyclists and add to air and noise pollution which is already poor and further assessment is required. It is premature to include SHA2 within LP2040 when transport modelling	No changes required.	Support noted. The Council has progressed the review of the local plan in accordance within the Local Plan Allocations and Local Development Scheme.

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LP2040 422	Richborough Estates - Richard Lomas	Vision, Strategic Objectives & Priorities	Yes	Yes	No	Yes	Yes	<p>It is noted that Vision remains broadly the same as that presented in the adopted Local Plan Strategy and that set out in the 'Preferred Options' consultation document. It is considered that it remains relevant and is broadly supported.</p> <p>Whilst it is accepted the Local Plan includes separate vision statements for the most sustainable settlements in chapters 12 to 15, the overarching vision fails to reflect these adequately. To improve clarity, the separate settlement specific vision statements should be signposted and their relationship with the overarching District-wide vision explained.</p> <p>It is also recognised that the Strategic Objectives are refined versions of those presented in the adopted Local Plan Strategy and the previous consultation documents. 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 may not be fulfilled by the current emerging Local Plan, particularly with regard to housing and infrastructure delivery.</p> <p>Overall, the Local Plan would benefit from clearer referencing and links throughout in order to clearly demonstrate how the spatial strategy and policies link back to the identified Strategic Objectives. For example, it is recommended that the relevant Strategic Objectives are identified in relation to each policy or chapter to reflect the approach taken in the adopted Local Plan Strategy.</p>	No changes required.	Support noted. Each chapter concludes with the strategic objectives/priorities which are linked to the policies within that chapter.
LP2040 423	Richborough Estates - Richard Lomas	Policy SP1	Yes	Yes	No	Yes	Yes	Council appears to be taking account of housing shortfalls arising within neighbouring LPAs by providing a contribution towards the GBBCHMA shortfall. This is welcomed, however it is not clear how the figure of 2,665 has been arrived at and why this has decreased from 4,500 set out in the Preferred Options document. Evidence exists in the form of the Strategic Growth Study to determine the housing shortfall and consider spatial options for satisfying this shortfall. Other authorities have used the Strategic Growth Study to inform their contributions and take the minimum level from the options generated in their areas. None of the figures associated with the areas of search in Lichfield District as such it is unclear as to how the provision of 2,665 contribution has been arrived at. The emerging Black Country Local Plan identifies a significant shortfall of 28,239. The reduction in contribution within the Lichfield Local Plan appears to be at odds with latest evidence in respect of more recent evidenced which demonstrates that there is an increasing shortfall within the Black Country and the application of 35% uplift to housing requirements for both Birmingham and Wolverhampton. In addition no Statements of Common Ground have been published to demonstrate support and verification of the approach from other LPA's within the HMA. SP1, or a new policy, needs to be drafted to provide a framework for an increased number of dwellings to meet GBBCHMA's current and future unmet needs. One solution to address the issue could be to identify parameters that would result in the need to review the Local Plan or provide flexibility through a serious of reserve sites which could come forward through clear monitoring triggers.	No changes required.	Local Plan 2040 proposes to provide 2665 dwellings to meet unmet needs from the GBBCHMA with 2000 towards the shortfall arising from the Black Country. This is in addition to unmet need provided in the adopted local plan. Previous consultation documents set out consideration of Strategic Growth Study options alongside wider evidence base material. District Council will prepare statements of common ground with those partners. In respect of the 35% uplift to Local Housing Need of cities this applies only to those authorities and guidance states this should not be met outside of the city authorities.
LP2040 424	Richborough Estates - Richard Lomas	Section 6: Infrastructure & Healthy Lifestyles	Yes	Yes	No	Yes	Yes	Local Plan recognises that developer contributions will have a significant role to play in infrastructure delivery through both S106 agreements and CIL. Richborough Estate agrees with the statement. Vision for Whittington seeks to ensure cohesion through the continued improvement and delivery of spaces, facilities and services and facilities. Concept Statement for land off Huddlesford Lane sets out infrastructure requirements in respect of the delivery of the allocation. Confirm that the allocation has the ability to satisfy the relevant infrastructure requirements set out in the Local Plan. The Local Plan, through concept statement and IDP seek to provide a clear guide to infrastructure expectations with regard to the Strategic Housing Allocation. Recommend that SP6 is renamed 'delivery of healthy communities to avoid duplication Strategic Policy 5.	No changes required.	Supported noted. Local Plan includes policies to ensure appropriate infrastructure is delivered within the District and as part of the Strategic Housing Allocation.
LP2040 425	Richborough Estates - Richard Lomas	Policy SP10	Yes	Yes	No	Yes	Yes	The approach to sustainable development, set out in Strategic Policy 10, 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 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 limit values to be exceeded.	No changes required.	Consider the policy wording as drafted is clear and appropriate.
LP2040 426	Richborough Estates - Richard Lomas	Policy SD1	Yes	Yes	No	Yes	Yes	The approach to securing high quality design as set out in SD1 is generally supported however it is not clear how the criteria relate to the Government's priorities for well-designed places set out through the National Design Guide, expanded upon on in the National Design Code. The National Design Guide recognises at paragraph 10 that "specific, detailed and measurable criteria for good design are most appropriately set out at the local level" and to improve legibility. Whilst this isn't an issue that goes to the heart of 'soundness' it may be more appropriate to structure the local criteria around the ten characteristics that reflect the Government's priorities set out in the National Design Guide.	No changes required.	National Design Guide and National Design Code published after Local Plan 2040 prepared. Not considered a soundness issue.
LP2040 427	Richborough Estates - Richard Lomas	Policy SP11	Yes	Yes	No	Yes	Yes	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 be amended to comply with national policy. It is suggested the reference to Green Belt changes at Whittington and Fazeley/Mile Oak/Bonehill is removed as this is dealt with through Strategic Policy 1.	No changes required.	Policy reflects national policy on Green Belt. Consider it is appropriate to references changes to Green Belt boundary within the Green Belt strategic policy alongside the spatial strategy strategic policy.
LP2040 428	Richborough Estates - Richard Lomas	Policy SP12	Yes	Yes	No	Yes	Yes	No evidence has been published to support the stepped approach to housing requirement, whereas evidence has been published which demonstrates unmet need within the wider GBBCHMA which should be addressed as a mater of urgency. Latest five year supply evidence suggests delivery in excess of higher requirements. It is not clear how the allocations identified reflect the 'Town and Key Rural Village focused development' spatial strategy and the identified settlement hierarchy. Proposed strategy is reliant on a smaller number of allocations. Further allocations should be identified inline with the 'town and key rural village' focused strategy.	No changes required.	Local Plan 2040 proposes to provide 2665 dwellings to meet unmet needs from the GBBCHMA with 2000 towards the shortfall arising from the Black Country. This is in addition to unmet need provided in the adopted local plan. The 2020 Position Statement identifies that the unmet need arising from the Black Country will emerging from 2027/28. Explanatory text within the plan sets out that the stepped approach is based upon local evidence of delivery and the 2020 Position Statement. Evidence on recent delivery suggests there has been a significant increase, however when compared over the plan period as a whole the average delivery is lower. Considered appropriate to consider delivery over the medium-long term. Local Plan 2040 proposes four strategic allocations and includes a significant number of smaller 'saved' allocations from the current local plan which will continue to deliver significant homes to meet the housing requirement to 2040.
LP2040 429	Richborough Estates - Richard Lomas	Policy H1	Yes	Yes	No	Yes	Yes	Concerned that the policy lacks sufficient flexibility to meet changing housing needs across the District and the plan period. It is considered the most appropriate approach to housing mix is to be guided by marker signals as defined in the most recent SHMA/HEDNA and that this should be routinely updated across the plan period. HEDNA does not identify sub-market areas across the District where housing need may be different, as a diverse district it is likely that housing needs are likely to differ between settlements. it appears the mix for Affordable Homes (ownership) is not aligned to the recommendations within the HEDNA, this maybe a typographical error. The policy lacks flexibility to reflect differences across up-markets, changing needs over the plan period and site-specific considerations which influence the mix that can be delivered. As the plan provides 2,665 dwellings for neighbouring authorities then the needs of neighbouring authorities will be crucial in determining housing mix. Policy sets out a minimum density of 35 dwellings per hectare. This is considered broadly appropriate.	Minor modification proposed to text of Policy H2 to correct typographical error in relation to the recommended proportion of Affordable Homes (ownership) where the recommended percentage from the HEDNA evidence has not correctly been transferred to policy. Minor modification to correct this factual error to be proposed.	Policy H1 is based upon up to date evidence within the HEDNA which details the housing mix required to meet the District's housing need based upon demographics. The policy provides flexibility within each type/size of house to ensure the policy is flexible. It is not considered appropriate to further split this by sub-markets as no such evidence is available and it is suggested such an approach would overly complicate the policy. Factual error within the table in the policy noted. Minor modification to correct this factual error to be proposed.
LP2040 430	Richborough Estates - Richard Lomas	Policy H2	Yes	Yes	No	Yes	Yes	The policy seeks to establish an affordable housing target of 35% on greenfield sites and 20% on previously-developed sites non-strategic sites. On strategic sites the affordable housing target is set at 20%, with the exception of 35% set for the allocation off Huddlesford Lane. These varying targets appear overly complex however it is recognised that targets have been informed by a plan-wide viability appraisal. 7.17 Richborough Estates can confirm that 35% affordable housing on Land off Huddlesford Lane, Whittington is achievable.	No changes required.	Affordable housing requirements for strategic sites are based upon evidence. It is noted that confirmation the site can provide a policy compliant level of affordable housing is provided.



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LP2040 431	Richborough Estates - Richard Lomas	Section 14: Larger Service Villages	Yes	Yes	No	Yes	Yes	Support the allocation of Land off Huddlesford Lane, Whittington as sound. Policy SHA4 identifies a number of design and infrastructure principles which are broadly supported. However, it is considered that some of these principles are not in accordance with national planning policy or guidance. Should be made clear that the principle of safeguarding and enhancing existing trees should only apply to trees and hedges of high quality. Not clear what is meant by 'sites of biodiversity value within the site'. Lifetime homes standards are no longer applied and are now covered by building regulations, as such the requirement should be removed. Requirement in respect of sustainable transport is poorly worded. It is not proportionate for a development to be required to improve existing public transport/connectivity beyond that required to mitigate the impact of the development itself.	No changes required.	Support for allocation noted. Consider that the policy wording and requirements of SHA4 are consistent with national policy and guidance and do not suggest development should provide service/facilities beyond those required to mitigate its impact.
LP2040 432	Richborough Estates - Richard Lomas	Sustainability Appraisal	Yes	Yes	No	Yes	Yes	Consider the Sustainability Assessment needs to provide further narrative to explain how the spatial strategy and associated allocations were selected over reasonable alternatives. Consider the assessment of reasonable alternative sites for Whittington as set out at Appendix D is incorrect. There are a number of inconsistencies/errors within the SA which should be rectified and these will need to be rectified within the SA prior to submission to the Secretary of State.	No changes required.	Comments noted. Submission of Local Plan will be accompanied by Sustainability Appraisal/Assessment.
LP2040 433	Richborough Estates - Richard Lomas	Green Belt Review	Yes	Yes	No	Yes	Yes	Green Belt Review conclusions is supported by Richborough Estates and reflects own assessment undertaken, which concludes that the removal of the site from the Green Belt would not fundamentally undermine the purpose of the Green Belt in this area.	No changes required	Comments noted. The District Council has utilised its own evidence base when determining Green Belt matters.
LP2040 434	Richborough Estates - Richard Lomas	Policy SHA4	Yes	Yes	No	Yes	Yes	Provides information in relation to the site which is proposed for allocation through policy SHA4. Have prepared a 'Site and Contextual Analysis Plan', 'Illustrative masterplan', 'Transport Assessment' supporting evidence. Jobs will be created during the construction phase of the development. Residents of the development will serve to support the existing local facilities and services within the village. Proposes area of parking for existing residents of Back Lane as part of development. Have developed options for the site which sought to make the most efficient use of the land whilst conserving the character and appearance of the conservation area.	No changes required	Comments and supporting information to site allocation noted.
LP2040 435	Richborough Estates - Richard Lomas	Whole document	Yes	Yes	No	Yes	Yes	Richborough Estates supports the Council in progressing a review of the Local Plan in line with the timescales set out in its Local Plan Allocations document. Provides an opportunity for the Council to comprehensively review the vision, strategic objectives, development requirements, spatial development strategy and policies for shaping detailed development proposals. Support the settlement hierarchy. Supports Policy SHA4 and the allocation of land off Huddlesford Lane, Whittington for residential development. There are a number areas where further clarification is necessary. Reduction in the contribution to the GBBCHMA shortfall is questioned. Concern over the small of allocations within the plan.	No changes required	Support noted. Comments and supporting information to site allocation noted.
LP2040 436	Neil Cox (Evolve Planning) on behalf of Bloor Homes (Midlands)	Whole Document	Yes	Yes	No		Yes	<p>Bloor Homes supports Lichfield District Council in progressing a review of the Lichfield District Plan. Bloor Homes supports the Council's proactive approach in progressing the review in line with timescales to ensure that an up to date policy framework exists with the District to guide growth to 2040 and to ensure that development within the District is genuinely plan-led. The 'Publication' consultation document follows the identification of the Council's Preferred Options, which identified a number of allocations and areas of safeguarded land, including land off Coulter Lane, Burntwood to which these representation relate.</p> <p>Bloor Homes raise a number of concerns that this Local Plan, as currently drafted, will not result in a comprehensive and coherent strategy in guiding development in the District to 2040 and beyond, with important strategic matters relating to Burntwood being pushed back to a subsequent Area Action Plan. It is also of concern that an Area Action Plan for Burntwood is not identified within the Local Development Scheme (LDS) published in April 2021; after member agreement on the Regulation 19 Local Plan and the Local Plan fails to provide any strategic direction for this AAP.</p> <p>Concerns are also raised in respect of identified housing growth requirement, spatial distribution of growth, approach to Green Belt release and deliverability of the strategy. Bloor Homes considers these issues of 'soundness' can be addressed through main modifications to the emerging Local Plan.</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base. Local Plan 2040 makes clear that an area action plan for Burntwood will be progressed following the adoption of the Local Plan 2040.
LP2040 437	Neil Cox (Evolve Planning) on behalf of Bloor Homes (Midlands)	Vision and Objectives	Yes	Yes	No		Yes	<p>It is noted that Vision contained within the Publication Local Plan remains broadly consistent to that contained within the adopted Local Plan Strategy and that set out in the 'Preferred Options' consultation document. It is considered that it remains relevant and is broadly supported.</p> <p>It is noted that the Vision states that growth within the District "will focus on enhancing the sustainability of our villages, delivering key infrastructure requirements to enable these communities to become cohesive, inclusive and healthy places," however, it is considered that this element of the vision should also be extended to Burntwood to align to the separate Vision for Burntwood.</p> <p>It is also recognised that the Strategic Objectives are refined versions of those presented in the adopted Local Plan Strategy and the previous consultation documents. Again, this approach is generally supported by Bloor Homes, 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 emerging Local Plan, particularly with regard to housing and infrastructure delivery.</p> <p>Overall, the Local Plan would benefit from clearer referencing and links throughout in order to clearly demonstrate how the spatial strategy relates back to the Vision and Strategic Objectives. For example, it is recommended that the relevant Strategic Objectives are identified in relation to each policy or chapter to reflect the approach taken in the adopted Local Plan Strategy.</p>	No changes required.	Comments noted. Relevant Strategic Objectives are identified at the end of each chapter of the Local Plan 2040 document.
LP2040 438	Neil Cox (Evolve Planning) on behalf of Bloor Homes (Midlands)	Paragraph 6.10	Yes	Yes	No	Yes	Yes	The Local Plan recognises at paragraph 6.10 that developer contributions will have a significant role to play in infrastructure delivery, through both S106 Agreements and the Community Infrastructure Levy. Bloor Homes agrees with this statement.	No changes required.	Support noted.

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LP2040 439	Neil Cox (Evolve Planning) on behalf of Bloor Homes (Midlands)	Policy SP1	Yes	Yes	No	No	Yes	<p>Lichfield District's Local Housing Need approach is not supported. The HEDNA concludes the Standard Method represents the minimum housing need, however Lichfield District Council is "encouraged to exceed this need with more provisions." The evidence demonstrates the local housing need for Lichfield District will be higher than that suggested by the standard method. The Local Plan is proposing an average delivery of 442dpa which sits within the range of need previously evidenced, however it is contended that this level of provision is required to meet local housing needs only. This substantially reduces or entirely eliminates any contribution towards unmet needs arising within the wider GBBCHMA.</p> <p>It is not clear how the figure of 2,665 dwellings has been determined and why the level of provision has decreased from the 4,500 contribution set out at the Preferred Options stage. It is not clear why paragraph 4.22 refers to a "capped contribution of 2,000" to be made "for the Black Country Authorities' needs starting after 2027" and how this relates to the 2,665 dwelling contribution identified within Strategic Policy 1. It is also not clear how this relates back to the original options identified.</p> <p>The Strategic Growth Study identified six areas of search within Lichfield District. Other LPAs (South Staffordshire DC and Cannock Chase DC) have utilised the Strategic Growth Study to inform a contribution to the shortfall by applying a minimum figure for each recommended area of search identified for an authority area within the study. Paragraph 4.21, makes reference to a Position Statement published in July 2020 which details that the need arising from Birmingham in particular has primarily now been met. This cannot be relied upon as this position statement is out of date and therefore the statement at paragraph 4.21 is misleading.</p> <p>There is a need for Strategic Policy 1, or a new policy drafted, to provide a framework to deliver an increased number of dwellings to meet GBBCHMA's current and future housing shortfall in line with the statutory Duty to Cooperate. One solution to address this issue is to identify parameters that would result in the need to review the plan or provide flexibility through the identification of a series of reserve sites which could come forward through the identification of clear monitoring indicators and triggers. The identification of reserve sites should focus on deliverability and include a range of locations, consistent with the Town and Key Rural Villages Focused Growth scenario.</p> <p>The distribution of housing growth fails to align to the identified settlement hierarchy or Residential Growth Option 2 on the basis Burntwood is afforded no strategic growth despite it being identified as a Level 2 settlement. Bloor Homes considers it necessary to resolve this inconsistency through the focus of further housing growth to Burntwood, through the identification of further Strategic Housing Allocations.</p> <p>Green Belt release was accepted by District Council Members who agreed the Proposed Submission Local Plan, however the proposal to identify safeguarded land at Burntwood has been subsequently removed prior to the start of this consultation. The reason for this change is unclear and</p>	No changes required	Local Plan 2040 proposes to provide 2665 dwellings to meet unmet needs from the GBBCHMA with 2000 towards the shortfall arising from the Black Country. This is in addition to unmet need provided in the adopted local plan. Previous consultation documents set out consideration of Strategic Growth Study options alongside wider evidence base material. District Council will prepare statements of common ground with those partners.
LP2040 440	Neil Cox (Evolve Planning) on behalf of Bloor Homes (Midlands)	Vision for Burntwood	Yes	Yes	No	No	Yes	<p>The Vision for Burntwood seeks investment in new infrastructure to ensure a more sustainable, healthier and self-contained settlement. The Infrastructure Delivery Plan (IDP) highlights infrastructure priorities that reflect the made Neighbourhood Plan.</p> <p>The lack of strategic growth focused to Burntwood and the lack of strategic direction for growth outlined within the Plan for a subsequent Area Action Plan only serves to completely undermine the ability for the infrastructure priorities for Burntwood to be delivered. A lack of growth focused to the town will result in continued disparity between Lichfield City and Burntwood in respect of infrastructure expenditure.</p> <p>The provision of CIL monies and separate financial contributions secured through a S106 agreement would provide significant opportunities for investment in social, physical and green infrastructure within Burntwood, aligned to the infrastructure requirements set out in the Local Plan and accompanying IDP. In addition, an element of the CIL receipts would be given to the Town Council to determine how it should be spent within the Neighbourhood Area. This investment could be focused upon improving the bus service, particularly within Boney Hay, or towards the provision of a new health facility, environmental improvements to stimulate investment at Sankey's Corner or indeed providing additional recreation facilities.</p> <p>Development at Coulter Lane would also offer the potential to deliver a significant number of additional affordable homes and an opportunity to provide a mix of market housing that better meets local needs e.g. smaller properties for first time buyers and those looking to downsize. Homes would be complemented by the provision of new green spaces, increasing the provision of community, leisure and recreation facilities and providing increased access to the surrounding countryside.</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base. Local Plan 2040 makes clear that an area action plan for Burntwood will be progressed following the adoption of the Local Plan 2040.
LP2040 441	Neil Cox (Evolve Planning) on behalf of Bloor Homes (Midlands)	Policy SP6	Yes	Yes	No	Yes	Yes	It is recommended that Strategic Policy 6 is renamed 'Delivery of Healthy Communities' as at present the title duplicates Strategic Policy 5	No changes required.	Comment noted. Policy name/numbering considered appropriate.
LP2040 442	Neil Cox (Evolve Planning) on behalf of Bloor Homes (Midlands)	Policy SP10	Yes	Yes	No	Yes	Yes	The approach to sustainable development, set out in Strategic Policy 10, 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 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 limit values to be exceeded.	No changes required.	Consider the policy wording as drafted is clear and appropriate.
LP2040 443	Neil Cox (Evolve Planning) on behalf of Bloor Homes (Midlands)	Local Policy SD1	Yes	Yes	No	Yes	Yes	The approach to securing high quality design as set out in SD1 is generally supported however it is not clear how the criteria relate to the Government's priorities for well-designed places set out through the National Design Guide. The National Design Guide recognises at paragraph 10 that "specific, detailed and measurable criteria for good design are most appropriately set out at the local level" and to improve legibility. Whilst this isn't an issue that goes to the heart of 'soundness' it may be more appropriate to structure the local criteria around the ten characteristics that reflect the Government's priorities set out in the National Design Guide.	No changes required.	National Design Guide and National Design Code published after Local Plan 2040 prepared. Not considered a soundness issue.
LP2040 444	Neil Cox (Evolve Planning) on behalf of Bloor Homes (Midlands)	Policy SP11	Yes	Yes	No	Yes	Yes	<p>The development management matters are addressed by reference to national Green Belt policy however the wording should be amended to comply with national policy.</p> <p>The Strategic Policy identifies the strategic release of Green Belt at Whittington and Fazeley/Mile Oak/Bonehill however, in light of comments relating to Strategic Policy 1, this should be extended to include Burntwood.</p> <p>The policy provides a mechanism for further non-strategic changes to the Green Belt to be determined through neighbourhood plans. This approach is not appropriate because it is important that Green Belt release is addressed within the Local Plan as it contributes to the overall strategy and sustainability of the District and settlements. In light of the approach to neighbourhood plans, this policy is silent on the role of the Burntwood Area Action in considering and directing strategic or nonstrategic changes to the Green Belt boundary.</p>	No changes required.	Policy reflects national policy on Green Belt. Consider it is appropriate to references changes to Green Belt boundary within the Green Belt strategic policy alongside the spatial strategy strategic policy.

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LP2040 445	Neil Cox (Evolve Planning) on behalf of Bloor Homes (Midlands)	Policy SP12	Yes	Yes	No	Yes	Yes	<p>The four strategic allocations are identified in Table 7 as having a total yield of 4,675 dwellings, however it is not made clear that only 2,200 homes are assumed to be completed by the end of Plan period in respect of Land to the North-East of Lichfield. Table 7 should be updated to reflect the supply relating to the plan period, totalling 12,206 rather than 13,306.</p> <p>In respect of the proposed stepped trajectory, no evidence has been published to support the deferred delivery of the housing requirement, whereas evidence has been published which demonstrates an unmet housing need exists within the wider GBBCHMA now, which should be addressed as a matter of urgency.</p> <p>It is not clear how the proposed allocations relate to the 'Town and Key Rural Villages Focused Development' spatial strategy and the identified settlement hierarchy. The proposed levels of growth vary significantly between settlements, including those at the same level in the settlement hierarchy. No strategic housing allocations are proposed within Burntwood despite significant contributions sought from within Level 1 and Level 3 settlements and a vision established for Burntwood to secure investment in new infrastructure to ensure Burntwood becomes a more sustainable, healthier and self-contained settlement. There is no justification as to why the quantum of housing focused to Burntwood has reduced from 838 dwellings within the Preferred Options to only 572 in the Publication Local Plan.</p> <p>It is contended that a supply of 572 dwellings within Burntwood between 2018 and 2040, as set out in Table 7, will not support the vision established for Burntwood and, to the contrary, stifle investment in new infrastructure within the town. With locally derived housing needs not being met, residents will look to other neighbouring centres. The committed supply identified for Burntwood appears incorrect. The evidence provided by the District Council does not support the figures contained within Table 7 relating to Burntwood and it can be concluded the identified housing growth figure of 572 dwellings apportioned to Burntwood will not be met through existing commitments.</p> <p>It is recognised that the Council is proposing to prepare an Area Action Plan for Burntwood, however the scope of this document is unclear and the Local Plan, as drafted, provides no strategic direction for this AAP. It is necessary for the Local Plan to provide a firm date by which the Burntwood Area Action Plan should be adopted and establish contingency arrangements if this date is not met. If for any reason these are not met, then the Local Plan should commence an immediate review as no alternative provisions are provided to take effect. The milestones for preparing this Area Action Plan are not contained within the latest Local Development Scheme (LDS).</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base. Local Plan 2040 makes clear that an area action plan for Burntwood will be progressed following the adoption of the Local Plan 2040.
LP2040 446	Neil Cox (Evolve Planning) on behalf of Bloor Homes (Midlands)	Local Policy H1	Yes	Yes	No	Yes	Yes	<p>Concerned that in its current form this policy, through reference to specific percentage figures, lacks sufficient flexibility to meet changing housing needs across the District and 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 SHMA and HEDNA. 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>It appears the mix set out for Affordable Homes (ownership) is not aligned to the recommendations contained within the latest HEDNA. This may be a simple typographical error where the mix for Tamworth has been transposed instead of those that relate to Lichfield.</p> <p>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 on many sites within Lichfield and Burntwood, particularly those outside of the centres. It is suggested that an amendment to the policy to focus this level of density upon centres.</p>	Minor modification proposed to text of Policy H2 to correct typographical error in relation to the recommended proportion of Affordable Homes (ownership) where the recommended percentage from the HEDNA evidence has not correctly been transferred to policy. Minor modification to correct this factual error to be proposed.	Policy H1 is based upon up to date evidence within the HEDNA which details the housing mix required to meet the District's housing need based upon demographics. The policy provides flexibility within each type/size of house to ensure the policy is flexible. It is not considered appropriate to further split this by sub-markets as no such evidence is available and it is suggested such an approach would overly complicate the policy. Factual error within the table in the policy noted. Minor modification to correct this factual error to be proposed.
LP2040 447	Neil Cox (Evolve Planning) on behalf of Bloor Homes (Midlands)	Local Policy H2	Yes	Yes	No	Yes	Yes	<p>The varying affordable housing targets appear overly complex however it is recognised that targets have been informed by a plan-wide viability appraisal.</p> <p>The Policy establishes a threshold of 500 dwellings for 'strategic sites.' However, the Local Plan and CIL Viability Assessment does not specifically test this threshold. Instead, the Viability Assessment provides a guide of 400-500 dwellings as being the cut off for non-strategic developments. Bloor Homes consider therefore that the 'strategic site' threshold should be reduced to 400 dwellings to align with the Council's evidence base.</p> <p>The 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/ HEDNA.</p>	No changes required.	Affordable housing requirements for strategic sites are based upon evidence.
LP2040 448	Neil Cox (Evolve Planning) on behalf of Bloor Homes (Midlands)	SHA1	Yes	Yes	No	Yes	Yes	<p>The lack of delivery of the Watery Lane site, in favourable economic circumstances, raises doubts as to the prospects of these sites coming forward in a timely fashion. There needs to be clear evidence to demonstrate that this site is deliverable within suitable timescales and at the proposed numbers. The trajectory needs to consider the impacts of allocating 70% of the total dwellings proposed to be allocated through this Plan to a single site which will deliver later in the plan period, including the risk of delays.</p> <p>The proposed allocation is poorly connected to Lichfield City as it appears that land to the north of the existing Streethay SDA is reliant on access from two roads (Watery Lane and Netherstowe Lane) which would require significant upgrading to support the proposed level of development. The existing west coast mainline railway line severs the proposed allocation from Lichfield City which further complicates the access arrangements and upgrading of road infrastructure in the area.</p> <p>There is a lack of evidence either in the Plan or in the supporting evidence base that identifies the necessary physical infrastructure to support this proposed allocation or whether this can be viably delivered. Significant work is currently outstanding to demonstrate that the local and strategic highway network can be upgraded to support this level of growth and other infrastructure such as schools and healthcare could be viably provided.</p> <p>It is suggested that the Lichfield District 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 location. The Council's proposed approach significantly restricts the flexibility and undermines the deliverability of the spatial strategy. Further scrutiny of housing land supply is necessary and it is recommended that a site specific trajectory is provided to allow for such scrutiny</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.

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LP2040 449	Neil Cox (Evolve Planning) on behalf of Bloor Homes (Midlands)	Sustainability Appraisal	Yes	Yes	No	Yes	Yes	<p>The Sustainability Appraisal 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 Employment Growth Option 2 but there is no clear explanation of how the selections were made and how this represents a balanced, sustainable strategy. There is also no explanation of how the 2,665 dwellings contribution towards the GBBCHMA shortfall has been determined.</p> <p>Burntwood, as a town placed second within the settlement hierarchy behind Lichfield City, clearly falls squarely within Residential Growth Option 2. The SA refers to Strategic Policy 1 and recognises that this policy directs new growth/development to the most sustainable locations via a hierarchy of centres and settlements. Burntwood is identified as a Level 2 'main centre' within the settlement hierarchy.</p> <p>The SA considers site specific reasonable alternatives but fails to take a more nuanced approach in considering alternative approaches to the spatial distribution of growth within Residential Growth Option 2. Alternatively, a further sub-Residential Growth Option should have been considered to reflect town and key rural village focused development (excluding new growth to Burntwood).</p> <p>It is also noted that the SA assumes areas of safeguarded land will be identified at Burntwood, Lichfield and Fazeley (Paragraph 2.4.7). This is not the case.</p> <p>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> <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 2,665 dwelling contribution towards the GBBCHMA has been derived.</p>	No changes required.	Comments noted. Submission of Local Plan will be accompanied by Sustainability Appraisal/Assessment.
LP2040 450	Neil Cox (Evolve Planning) on behalf of Bloor Homes (Midlands)	Green Belt Review	Yes	Yes	No	Yes	Yes	<p>The Green Belt Review recognises the Preferred Options Local Plan (November 2019) proposed a number of areas of safeguarded land which were proposed to be removed from the Green Belt to meet development needs beyond the plan period. Supporting paragraph 16.7 noted that the 2019 Green Belt Review informed the planning judgement undertaken in relation to the changes to the Green Belt boundary.</p> <p>The Green Belt Review includes a Green Belt impact assessment to consider the impact of development. In respect of adjacent sites: land West of Coulter Lane (172); land East of Coulter Lane (267); and land East of Rugeley Road (130) it concludes the following: If combined, these sites would be enclosed by the settlement to the east, south and west and therefore development could be seen as 'rounding off' the settlement pattern. The combined release of these sites would not exacerbate any of the above impacts.</p> <p>This conclusion is supported by Bloor Homes and supports the removal of this land from the Green Belt in line with the proposals contained within the Preferred Options Local Plan and the version of the Publication Local Plan agreed by Cabinet in early 2021.</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base. Local Plan 2040 makes clear that an area action plan for Burntwood will be progressed following the adoption of the Local Plan 2040.
LP2040 451	Neil Cox (Evolve Planning) on behalf of Bloor Homes (Midlands)	Whole Document	Yes	Yes	No	Yes	Yes	<p>Bloor Homes has an interest in approximately 27.3 hectares of land to the north east of Burntwood, occupying an area of land between the former St Matthew's hospital site to the east and the main urban area of Burntwood to the south and west. Coulter Lane (SHLAA ref: 172 &amp; 267) bisects the site creating two development parcels.</p> <p>The site at Coulter Lane represents a logical, modest extension to Burntwood that could deliver around 480 new homes. It has the ability to accommodate a range of homes to assist in meeting locally derived needs, including starter homes, family homes and homes for downsizers. The site provides an opportunity to assist in addressing a number of issues that relate to Burntwood and to assist in delivering the following benefits: temporary employment benefits supported by the construction phase, growing labour force, household spend, increased council tax income, CIL receipts, affordable housing delivery.</p> <p>The development at Coulter Lane would be aligned to the Councils preferred strategic option for growth, assisting in: consolidating the sustainability of the existing urban settlement of Burntwood, providing improved infrastructure in line with the Vision for Burntwood to support new and existing communities within town, providing improved public transport provision within Burntwood, providing a range of homes, including affordable, to meet local housing needs identified within Burntwood, supporting the delivery of an improved and enlarged town centre at Burntwood through the provision of increased household expenditure, improving outdoor, indoor leisure facilities within Burntwood and providing high quality development within a highly sustainable location.</p> <p>The site is suitable, available and residential development is achievable such that the site is capable of delivering in full (480 dwellings) prior to 2040.</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base. Local Plan 2040 makes clear that an area action plan for Burntwood will be progressed following the adoption of the Local Plan 2040.
LP2040 452	Ben Cook (Pegasus) - Drayton Manor Resort	Whole document	Yes	Yes	No	Yes	Yes	Drayton Manor Resort limited considers that the Local Plan is not currently effective, although can easily be made effective subject to minor modifications to local policies E1 and E2.	No changes required.	Local Plan 2040 includes specific policy in relation to Drayton Manor Theme park.
LP2040 453	Ben Cook (Pegasus) - Drayton Manor Resort	Profile of the District	Yes	Yes	No	Yes	Yes	Drayton Manor Resort are pleased the District Profile section recognises that tourism forms a significant part of the local economy including specifically recognising the importance of Drayton Manor Theme Park. Concur with the findings of the Economic Impact of Tourism study (2019) which predicts growth of tourism in the district. Policies in the Local Plan 2040 should seek to support and capitalise on this growth by encouraging and supporting growth and development within the tourism sector.	No changes required.	Support noted.
LP2040 454	Ben Cook (Pegasus) - Drayton Manor Resort	Para 3.21	Yes	Yes	No	Yes	Yes	It is encouraging that Strategic Objective 7: Economic Prosperity confirms that decisions, plans, policies and programmes should actively support measures which enable the local economy to thrive and adapt to changing economic circumstances and make the most of newly arising economic opportunities	No changes required.	Support noted.
LP2040 455	Ben Cook (Pegasus) - Drayton Manor Resort	Para 3.24	Yes	Yes	No	Yes	Yes	Drayton Manor is supportive of Strategic Objective 10: Visitor Economy, in that the Local Plan and planning decisions will seek to increase the attraction of the District as a tourist destination through supporting and promoting the growth of existing tourist facilities and attractions. Part of the delivery of this objective will be the provision of a greater variety of accommodation for visitors, the development of new attractions which are appropriate in scale and character to their locations and the enhancement of existing attractions.	No changes required.	Support noted.
LP2040 456	Ben Cook (Pegasus) - Drayton Manor Resort	SP11	Yes	Yes	No	Yes	Yes	Drayton Manor recognises the inclusion of Policy SP11 regarding Green Belt land. The Council should satisfy itself that this policy is consistent with the provisions of the National Planning Policy Framework (July 2021), particularly, paragraph 149. Is it suggested that reference is simply made to paragraph 149 (or any subsequent revision), rather than attempting to rearrange the wording of the paragraph within Policy SP11 of the Local Plan. Doing so risks unintentionally altering the meaning or the application of paragraph 149, and therefore risks the Local Plan failing to comply with the fourth test of soundness (to be consistent with national policy).	No changes required.	Policy wording is consistent with national planning policy.
LP2040 457	Ben Cook (Pegasus) - Drayton Manor Resort	SP13	Yes	Yes	No	Yes	Yes	<p>Suggests re-wording of Strategic Policy 13. As currently worded, the policy could be interpreted as restricting any employment generating development that does not fall within either Classes E, B2 or B8. This is clearly not the intention of the policy. Rather, it is assumed that the policy is seeking to ensure similar complementary uses are co-located to not only secure economic benefits, but also ensure the amenity of neighbours is preserved. It is therefore suggested that the policy wording be amended to:</p> <p>"Development proposals outside of the traditional use classes (E, B2 and B8) will usually not be supported within existing or allocated employment sites 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 above specified use classes would not detrimentally affect an employment area."</p>	No changes required.	Policy wording is consistent with national planning policy.



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LP2040 458	Ben Cook (Pegasus) - Drayton Manor Resort	E1	Yes	Yes	No	Yes	Yes	Supports inclusion of Local Policy E1. Policy wording is supported on the whole however there are elements of the policy that remain unclear, such as the nature of the planning brief and masterplan referred to within both the policy and the supporting text. Not clear whether the documents should be submitted as part of a planning application, as part of the local plan process or whether they are to be collaborative documents produced by both Drayton Manor and the council beyond the planning policy and development management framework. Nonetheless, Pegasus have attached a 'Five Year Plan' setting out ambitions of Drayton Manor between 2022-2026 for the park as a whole. This will form a basis for both the planning brief and masterplan to be further discussed with the council. Drayton Manor Resort have raised an issue with the second bullet of the policy which requires applications for development at Drayton Manor Park to 'address the potential for wet woodland and grassland restoration and re-creation'. Supporting text to Policy E1 at paragraph 9.16 suggests that this requirement is based upon the findings of the Nature Recovery Network Connectivity Mapping (2019) which 'identifies an opportunity for the improvement/creation of grassland and wetland where appropriate'. Drayton Manor Park suggests that the phrasing 'where appropriate' from the paragraph 9.16 of the supporting text should also be included within the policy wording itself so that it reads: 'They address the potential for wet woodland and grassland restoration and re-creation where appropriate;'. Given that Drayton Manor Park comprises a large brownfield site, it would not be appropriate for every single development to address the potential for wet woodland and grassland restoration. Furthermore, be principal area of woodland within the Drayton Manor boundary lies to the west of the main theme park area and is well removed from development. Given the site lies within the Green Belt, there is very limited scope for development beyond the current confines of the theme park and therefore it is considered that it will only be appropriate for applications to address the potential for wet woodland and grassland restoration and re-creation in a small number of instances.	No changes required.	Policy wording is consistent with national planning policy.
LP2040 459	Ben Cook (Pegasus) - Drayton Manor Resort	E2	Yes	Yes	No	Yes	Yes	Drayton Manor supports the inclusion of Policy E2, although it is submitted that the wording 'where this does not conflict with other local plan policies' is not sound. The requirement for proposals to 'not conflict with other local plan policies' is repeated three times throughout the wording of the Policy. It is commonly understood that the policies within any development plan should be read as a whole. Further, it was confirmed by the Court of Appeal judgment in Corbett v Cornwall Council [2020] EWCA Civ 508 that a breach of a particular development plan policy (even a policy expressed in absolutist manner such as Policy E2) does not necessarily equate to a failure to accord with the development plan as a whole. The Court of Appeal confirmed that the weight to attach to the respective policies and, therefore, the decision as to whether the proposal was in accordance with the plan as a whole, was a matter of judgment for the decision maker. The judgment illustrates that, even in cases where there is one policy which suggests permission should not be granted, a proposal may nevertheless be lawfully found to be in accordance with the development plan if there are policies which also support the nature of development under consideration. The requirement of Policy E2 for development to 'not conflict with other local plan policies' is accordingly unnecessary and does not reflect this legal precedent.	No changes required.	Policy wording is consistent with national planning policy.
LP2040 460	James Chadwick (SCC)	Strategic Objective 5	Unanswered	Unanswered	Unanswered	Yes	Unanswered	Technical work to support the three strategic housing allocations has necessarily been based upon the collective availability of data from 2019 or earlier. The assessments can only be considered to be partial as some key junctions have lacked the availability of 'existing data' and further surveys are required to be undertaken to fill in the gaps. The extension of the Lichfield SATURN Model, which we advised was necessary to test the proposals for SHA1 and SHA3 proposed strategic allocations has been delayed significantly. Whilst the geographical scope has been successfully extended, the data to calibrate and validate the model won't be collected until October 2021, meaning that forecasting and testing can't happen until the first quarter of 2022. Currently evidence regarding acceptability needs to be supplemented by professional judgement. The Staffordshire Local Cycling and Walking Infrastructure Plan (LCWIP) has been published, containing proposals for Lichfield City. However, the Lichfield District Integrated Transport Strategy has not yet been updated to cover the period of the new Plan to 2040. A paragraph should be included that captures the importance of the National Cycle Network, local cycle networks, bridleways, public rights of way, the Heart of England Way, the Trent and Mersey Canal and Coventry Canal. It needs to be clarified that the Lichfield to Walsall (via Brownhills) disused rail line is being safeguarded either as a greenway or for the reopening of the line for rail services. A feasibility study is being completed for the use of the route as a greenway, with the requirement from Network Rail that a lease to deliver the greenway would have a break clause to allow the line to come back into use in the future. Responses have previously set out that there is an existing shortage of lorry parking in Staffordshire as identified by the Department for Transport (DfT) National Survey of Lorry Parking 2017. Suggested that, in line with NPPF paragraph 107, the 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. The latest publication version 2018-2040 identifies the need for a lorry parking facility in the Fradley. However, the Policy wording currently fails to identify a site for this facility, which is clearly needed. It is suggested that a general policy on parking ensures that any Logistics development proposals include adequate provision within site for drivers to take their statutory rest breaks if so required. With regards to electric vehicle charging (EV) the Plan only makes reference to EV charging for residential development in the concept statements for the main allocations and this is fairly vague. Suggested that there should be policy provision for all new dwellings to be provided with the necessary infrastructure to allow home charging to the current standard at the time of construction and for apartment/flat development consideration is given to how communal charging facilities will be provided and managed.	No changes required.	Comments noted, LDC working proactively with SCC with regards to emerging transport evidence particularly with reference to proposed strategic housing allocations
LP2040 461	James Chadwick (SCC)	Strategic Policy 2 - Sustainable Transport	Unanswered	Unanswered	Unanswered	Yes	Unanswered	The potential impact of HS2 on the walking and cycling network need to be recognised. Ongoing negotiations are taking place between HS2 Ltd and Staffordshire County Council to ensure that bridleways and rights of way are protected and appropriately diverted where necessary. Walking and cycling networks need to be Coherent, Direct, Safe, Comfortable and Attractive, in line with core design principles embedded in Gear Change and Local Transport Note LTN 1/20 Cycle Infrastructure Design, which is referenced in the National Model Design Code. Within Gear Change, the Government has announced the setting up of an inspectorate led by a new national walking and cycling commissioner. They will be a statutory consultee within the planning system, pressing for high quality walking and cycle provision in Local Plans and planning applications, in line with new standards laid down in LTN 1/20 guidance. NPPF Paragraph 110a states that applications for development should give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas. This should be acknowledged in the Local Plan.	No changes required.	Local Plan 2040 indicates the route of HS2 on its accompanying policies maps and references this throughout the document. HS2 project is dealt with under its own separate legislation. Local Plan 2040 includes policies relating to the protection and enhancement of the natural environment.
LP2040 462	James Chadwick (SCC)	Strategic Policy 4 - Transport Safeguarding	Unanswered	Unanswered	Unanswered	n/a	Unanswered	It is not clear how the protection relates to land outside the highway boundary that may be needed for deliverability of interventions. The incorporation of additional land into the highway may require the use of compulsory purchase powers to be considered to assist with land assembly. Consider that the Policy appears to give protection against land around the identified junctions being developed without consideration of what land may be needed for wider highway improvements. However, it is not immediately clear how the Policy will aid in facilitating the delivery of Local Plan objectives if the land around the identified junctions is not proposed for development but would still be needed. Junction improvements marked on the Policy Maps will require revision following completion of the transport evidence base. This is currently incomplete, but the additional junctions referred to above should be added with most of them emerging as concerns during the preparation of the evidence base to date.	No changes required.	Comments noted - emerging evidence base working with SCC should assist in addressing aspects of the issues raised.



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LP2040 463	James Chadwick (SCC)	Strategic Policy 5 - Infrastructure	Unanswered	Unanswered	Unanswered		Unanswered	<p>It is acknowledged that Lichfield District Council have a Community Infrastructure Levy (CIL) in place for new development in their area to help fund infrastructure delivery and that the annual Infrastructure Funding Statement (IFS) will set out how CIL and S106 will be used to help fund infrastructure. Since the amendments to the CIL regulations and removal of R123 we will also seek S106 obligations to secure necessary Education infrastructure where we can clearly demonstrate compliance with R122 on the use of Planning Obligations for residential proposals that impact on availability of school places. S106 contributions from new development across the district will be sought in line with the Staffordshire Education Infrastructure Contributions Policy (SEICP) in order to fund both primary and secondary provision in the future. The Plan and future IFS should make this point clear. In addition, the Infrastructure Delivery Plan will need updating to reflect this. The SEICP provides the broad approach to identifying the impact that new residential development has on education infrastructure and the necessary mitigation required to make development acceptable in planning terms.</p> <p>With regards to the preferred areas of growth there is need provide education infrastructure. Strategic Policy SHA1 the provision of education in the form of a secondary school and two primary schools continues to be included. At primary level, 3,300 dwellings will require 5 Form Entry (FE) of provision which could require a 2FE primary school and a 3FE primary or equivalent. A 2FE primary school would require a minimum site area of 20,430m2 and a 3FE primary school a minimum site area of 29,445m2 In relation to the proposal for a secondary school on site, consider that spatially this sits reasonably well when considered against the location of existing schools and the areas for housing growth. However, we continue to seek confirmation from LDC that they are content that this preferred development location is appropriately located to provide the additional secondary school infrastructure that is required to mitigate the impact not only from this development but also further housing allocations across Lichfield. The location of the secondary school and its connectivity to other settlements outside of the city centre, is crucial to support sustainable travel to and from school.</p> <p>With regards to Fradley the overall level of new housing (recently built, committed and proposed through this Local Plan Review) is too high for the level of primary school infrastructure we are able to deliver on the two primary school sites within the village. At the same time the overall level of proposed new housing is insufficient in numbers to sustain a third primary school. The overall level of new housing in Fradley is insufficient to make a third primary school viable proposition. As per previous development in Fradley the strategic housing development proposed in the Plan does have the potential to grow. Therefore, there may be further opportunities within the village for additional housing development, either speculatively or through future Local Plan reviews. If additional housing is considered for the village it would need to be an appropriate level to justify the delivery of a further primary school in the village. Since the last Local Plan was published education infrastructure in the village has been under considerable pressure and already compromises have had to be made to mitigate the impact of the overall number of new homes. Continued partnership working is necessary to avoid being in a similar position in the future. Therefore, we suggest that as an alternative to identifying a school site through the</p>	No changes required.	Infrastructure Funding Statement will be published annually as required by national guidance. The Infrastructure Delivery Plan is a 'living' document which will be updated to take account of the latest information where appropriate. Local Plan 2040 includes policies which seek to ensure appropriate infrastructure is delivered alongside development.
LP2040 464	James Chadwick (SCC)	Strategic policy 8 (SP8): Blue infrastructure, watercourses and flood risk	Unanswered	Unanswered	Unanswered		Unanswered	<p>Support policy SP8 - set out clear requirements for flood risk and use of SUDs and the acknowledgement within the policy of future maintenance of SUDs systems. We note Paragraph 6.51 signposts to our SUDs Handbook, which provides guidance on SUDs design etc. The Handbook also provides a starting point for determining whether SUDs schemes put forward by developers are acceptable. Therefore, we would suggest that this paragraph should be strengthened to ensure that the Handbook is a material consideration in the planning decision making process.</p>	No changes required.	Comments noted.
LP2040 465	James Chadwick (SCC)	SHA1	Unanswered	Unanswered	Unanswered		Unanswered	<p>The transport work undertaken to date has highlighted a number of concerns with regards to accessibility from Lichfield City and Fradley, most notably the impact on the A38 and wider strategic road network. SCC, LDC, Highways England and landowners agents have been working on modelling using previous data pre-pandemic however the current traffic modelling is an emerging process.</p> <p>It is noted that developers are not proposing to provide vehicular connections between the North of Lichfield and Streethay developments when both would benefit from this. Connectivity is only proposed via the PROW network at the moment. The Plan should ensure that this is explored to its fullest extent. No consideration has been given to the required level of public transport services to date.</p> <p>Assessment work to date has highlighted that improvements will be required to a number of key junctions within Lichfield, particularly those located along Eastern Avenue. Some of the engineering solutions proposed to date will not satisfactorily accommodate the forecast level of traffic generation unless travel behaviour changes significantly from pre-pandemic patterns. Without traffic data this cannot yet be established. The highway solutions proposed for Trent Valley Roundabout and Hilliard's Cross currently require third party land acquisition. The use of compulsory purchase powers may need to be considered to assist land assembly, demonstrate deliverability of interventions and ensure the allocation is found sound. Without completion of the transport evidence base there is a risk that not all the necessary mitigation will be identified, and the allocation may fall short of being acceptable in transport terms.</p>	No changes required.	Local Plan 2040 identifies a number of key junctions where improvements are required. The District Council is working with the County Council to conclude transport evidence supporting the Local Plan 2040 which had been delayed due to the Coronavirus pandemic.
LP2040 466	James Chadwick (SCC)	SHA2	Unanswered	Unanswered	Unanswered		Unanswered	<p>Currently SCC as the Highway Authority, needs to be satisfied that the development can be made broadly acceptable in transport terms and that there are no insurmountable problems preventing Lichfield District Council from allocating the site. The national emergency caused by the COVID pandemic has made it impossible to collect reliable current traffic survey data needed to complete all of the necessary assessment work. It is well documented that during the pandemic some journeys are not being made and where they are travelling habits have changed. At the time of writing no one knows when or if pre-Covid traffic conditions will return. In order to make progress with the plan-making to the timescales required by LDC, both Mode and SCC agree that the supporting assessment work needs to rely on data available before March 2020 (pre-pandemic). Unfortunately, this does not cover all locations required and future data collection will be necessary to address outstanding issues.</p> <p>A formal scoping exercise will be required at planning application stage to identify further locations along the local highway network that are likely to require assessment once reliable traffic and travel data can be collected.</p> <p>SCC would like confirmation that there is enough land within Bloor Homes' control to add a ghost right turn at the northern access priority junction, should this be considered necessary at the planning application stage. SCC believe that the proposed gyratory system which improves the Mile Oak traffic signals will be required to fully mitigate the impact of this development and would like to see a firm commitment to its provision within the strategy.</p> <p>This site is located beyond the critical 3 miles distance for access to available secondary school education, removing any opportunities for students to walk and cycle. Further emphasis upon provision of school transport to secondary education facilities is supported and encouraged. The Highways and Transport Strategy refers to home to school travel for students residing at the proposed development and identifies that bus subsidies will be provided by the developer (secured via a S106 agreement).</p> <p>It is agreed that excellent cycling links will be required to connect this site to local amenities. Local cycling and walking infrastructure plan 2021 - Staffordshire County Council (Plan 9.6) identifies two possible routes linking the site to Ventura Park, the canal and the Town Centre and Fazeley Amended policy wording to design section of SHA2 to include: Provision for an acceptable means of vehicular access to the site from B5404 Hints Road and A453 Sutton Road, improvement of the strategic and local highway networks including the provision of a gyratory system to replace Mile Oak traffic signals; and provision of a choice of sustainable transport infrastructure and services</p>	No changes required.	Local Plan 2040 identifies a number of key junctions where improvements are required. The District Council is working with the County Council to conclude transport evidence supporting the Local Plan 2040 which had been delayed due to the Coronavirus pandemic.

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LP2040 467	Councillor Derick Cross	Whole plan	Unanswered	Unanswered	Unanswered	No	Yes	I am an elected District Councillor for the Alrewas and Fradley Ward and member of the planning committee. Commend the council in understanding the need for a new Local Plan to account for development needs, a matter of some controversy and one I feel the Council has been less than transparent due to lack of evidence and justified reasoning behind the overall housing figure for the District and the wider need factoring in the GBBCHMA shortfall. I am not convinced the proposed 2,665 unmet need derived from the HEDNA is justified. I would like to see a housing need topic paper produced in order that the position can be set and agreed. Support the concept of SHA3 in order to provide commensurate community infrastructure. The Leavesley development in my opinion was properly allowed on appeal because it delivers elderly persons housing and care facilities, self and custom build, canal and highway improvements and a neighbourhood centre with community hub. However, the Wilson Bowden development will need careful assessment and a review of its scale in relation to Fradley in order that it reads with the village and does not leak into the countryside as shown in the Council's draft plan. The Parish supports the development north of the plan but only to fill the current funnel but not any further north into the countryside and therefore the red line boundary needs to be adjusted accordingly. I am keen to explore this in relegation to the '500 houses target' and what figure is being used set against the already approved Leavesley development. The development delivers on many of the neighbourhood plan aspects the Parish are keen to see early delivery. The plan trajectory is incorrectly back loaded with only minor levels of development from 2025-2028. An topic paper is required in relation to the plan trajectory with clear reasoning and outcomes demonstrating clear analysis. The plan is lacking in this regard. SHA1 is a lynch-pin to plan delivery which is compromised by the fact that highway studies, modelling and mitigation have not been undertaken. Further the aspect of a back-loading delivery of a third of the development beyond the plan period requires reasoning and justification.	No changes required.	Housing requirement within the Local Plan 2040 provides for the Local Housing Need (LHN) as established by the Standard Methodology and supported by evidence within the HEDNA. Local Plan 2040 provides contribution toward unmet needs arising from the GBBCHMA, contribution is considered to be appropriate and soundly based. The Preferred Options & Policy Directions and Preferred Options documents along with the explanatory text of the Local Plan 2040 set out how the contribution toward unmet need has been established. Allocations within the Local Plan 2040 have been identified to meet the housing requirement set out within the plan. Such allocations are based upon consideration of the Council's evidence base. Delivery of strategic allocations and the housing trajectory is based upon evidence, including that set out within the SHLAA and five year housing land supply paper and understanding of delivery assumptions based upon evidence.
LP2040 468	James Chadwick (SCC)	SHA3	Unanswered	Unanswered	Unanswered	Yes	Unanswered	SCC has been working with Lichfield District Council (LDC), Highways England (HE) and Atkins Transport Consultants to extend the 2015 Lichfield City SATURN Transport Model to cover Curborough and Fradley. It was anticipated that a 2040 forecast version of the model would provide the means by which the impact of this allocation could be understood, and any proposed transport mitigation tested. Unfortunately, the national pandemic has delayed the collection of the necessary traffic survey data to enable reliable understanding and consideration. A technical note has been produced. In summary, SCC is content with the trip rates and census data chosen to replicate the trip distribution. In the absence of SCC's extended Lichfield SATURN model, which is still under development, SCC's opinion is that the use of Google maps would have been better as it takes existing congestion into account. As work progresses there will need to be a consideration of connectivity and sustainable transport, and education transport issues. At the moment we know that there will be primary and secondary school children who need to travel; the latter may well be within walking distance of a potential new high school on the north of Lichfield site. Nevertheless, without a completed transport evidence base, there is a risk that not all the necessary transport mitigation will be identified before submission, and the allocation may therefore fall short of being acceptable in transport terms. Amendments should be sort to the policy wording of SHA3 with regards to infrastructure to include the following: • Provide for an acceptable means of access to the strategic and local highway network including identified offsite highway improvements to mitigate residual transport impact • Provision of school transport to Primary and Secondary Education facilities as appropriate • To assist in the improvement of air quality and advances in vehicle technology over the plan period and beyond, the development site will be expected to incorporate facilities for the charging of electric vehicles; new homes will be provided with the necessary infrastructure to allow home charging to the current standard at the time of construction.	No changes required.	Local Plan 2040 identifies a number of key junctions where improvements are required. The District Council is working with the County Council to conclude transport evidence supporting the Local Plan 2040 which had been delayed due to the Coronavirus pandemic.
LP2040 469	James Chadwick (SCC)	SP15 - Natural Resources	Unanswered	Unanswered	Unanswered	Yes	Unanswered	Largely support SP15 and relevant supporting policies. In paragraph 6 of the policy it states 'The District Council will seek to deliver overall net gain...'. Given the NPPF 2021 Policy emphasis is for securing measurable net gains to biodiversity and with the Environment Bill posed to set a minimum requirement for net gain in planning it is our contention that the wording in SP15 is not sufficiently robust. Would be reasonable to change the wording to a more positive statement such as 'within the context of the Local Plan, the District Council will ensure a measurable overall net gain' to better reflect NPPF section 15 and the emerging Environment Bill. Paragraph 8 is welcomed because it makes clear that off-site effects of development will need to be considered.	No changes required.	Support noted.
LP2040 470	Natural England (Gillian Driver)	Whole Plan	Unanswered	Unanswered	Unanswered	Yes	No	We agree with the conclusion that for those European sites in the area of search with features sensitive to air pollution, adverse effects on their integrity, alone or in combination, cannot be ruled out due to a lack of evidence. The HRA should be updated to reflect the river easement SAC development contribution scheme came to an end earlier in the year and the fact that Natural England is working with local planning authorities on a proposal to introduce a revised developer contribution scheme 3. Natural England will continue discussions with local planning authorities on the mitigation scheme and proposes that this theme is included in a statement of common ground with LDC accordingly. We draw the councils attention to the fact that the SAC is currently failing to meet its conservation objections in relation to water quality. Potential air quality issues will need to be addressed as part of the HRA, until they are we cannot advise that the plan is effective. The plan is not consistent with the NPPF. Some policies have potential to conflict with other policies: NR1, NR2. Policy NR2 makes specific reference to according with other policies in the local plan, whereas NR1 does not. This approach is inconsistent and also conflicts with section 'local plan documents and how to read this document 1.12-1.30 which states: "1.17 The local plan should be read as a whole. Development proposals will be judged against all relevant policies.1.18 The local plan contains both strategic and local policies. Both of these policy types are of equal importance in decision making." The plan does not distinguish between the hierarchy of designated sites in line with paragraph 175 of the NPPF, this should be rectified. We should advise that SP15: Natural resources would be a relevant place to add this in. References to designated sites should reflect the hierarchy as well: "Designated sites include; Special Areas of Conservation (SAC); Sites of Specific Scientific Interest (SSSI); Sites of Biological Importance (SBI); and Local Geological Sites." The plan does not make reference to the mitigation hierarchy set out in paragraph 180a.) of the National Planning Policy Framework, we advise that this is added into Strategic policy 15 (SP15): Natural resources and referred to in Local policy NR2: Habitats and biodiversity. Amendment to Strategic policy 9 (SP9): Water quality We would advise that additional wording should be added to Strategic policy 9 (SP9): Water quality, so that the last paragraph reads as follows: "Further site-specific analysis of any development proposals located in proximity or upstream of European/ International sites and SSSIs will be required before development commences. Chapter 5 sustainable transport - changes may be required as the approach to dealing with air quality impacts on European designated sites Midlands Heathland Heartland - we believe that the project should be added to NR4 LC2 - reference is included within policy to Stowe Pool and Walk Milk Pit Site of SSSI B1 - reference is included within the policy to the proximity of Chase water and the Southern Staffordshire Coalfield Heaths SSSI and Gentles haw Common SSI. Soil and best and most versatile agricultural land - not adequately in line with paragraph 174 a) and b) of the NPPF of the governments 25 year environmental plan.	No changes required.	Local Plan 2040 has been accompanied by Habitat Regulations Assessment (HRA) at all stages of the plan's progression. HRA will be submitted alongside the local plan.

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LP2040 471	Janet Rowley Clarion Housing Group	SP1	No	No	No		Yes	Strategic Policy 12: Housing Provision is objected to on the basis of soundness, not considered to be positively prepared, justified or effective and is not consistent with the NPPF in terms of boosting housing supply and its contribution towards the Greater Birmingham and Black Country Housing Market Area's (GBBCHMA) unmet need and it also fails to comply with the Duty to Co-Operate (DTC). SP12 sets requirement to deliver a minimum of 9,727 homes in the District 2018-2040 - around 321 homes per year between 2018 and 2027. The Council propose an uplift to 526 homes per year between 2027 and 2040, includes a contribution of 2,665 homes towards the GBBCHMA unmet need between 2027 and 2040 at an annual rate of approximately 205 dwelling per year resulting in an overall housing target of 13,306 over the plan period - a substantial reduction from the level of housing provision proposed within the PO document, and results from the decision of the Council to reduce its contribution to the GBBCHMA unmet housing need from the originally proposed 4,500 homes to 2,665 homes. The reduction has not been explained or justified through reference to evidence within the Plan or supporting evidence base and consequently this is not supported by Clarion. GBBCHMA Unmet Housing Need - The West Midlands has been struggling unsuccessfully with the significant strategic challenge of meeting the unmet housing needs of Birmingham for a number of years. 2 elements - from Birmingham City; and that coming from the Black Country. The Council have stated that 75% of their contribution is to help meet the Black Country's emerging unmet housing need. Based on the latest figures included in Policy SP12, this equates to a contribution to the Black Country's unmet need of 2,000 dwellings between 2027 and 2040, which equates to c.150 dwellings per year for that period. The GBBCHMA Position Statement published in July 2020, concluded that the 2011-2031 shortfall is now estimated to be 2,597, a fall of 13,728 since the Greater Birmingham Strategic Growth Study was published in 2018. Appendix 2 of the 2020 Position Statement sets out the allocated and emerging contributions made by the GBBCHMA authorities, which it says totals between 18,130-20,130 dwellings: This huge reduction in the identified GBBCHMA shortfall set out in the 2020 Position Statement has been calculated on the basis of banking all the 'commitments' made by the GBBCHMA authorities to contribute towards the unmet need despite there being no formal agreement between the authorities making up the GBBCHMA regarding the apportionment of this unmet need, and importantly, these 'commitments' not forming part of any adopted Local Plan that has been tested through the examination process. In this context, arguably, the only adopted and examined shortfall is that set out in BCC's adopted Local Plan. Therefore, contributions ought to be considered against the adopted c.37,900 shortfall. Whilst the Council have reduced their contribution to the GBBCHMA unmet need, this further undermines the GBBCHMA position as the identified reduction in shortfall in 2020 was based on Lichfield's original contribution of 4,500. It is concluded that although Birmingham City Council has markedly improved its housing land supply since establishing the level of unmet need in 2017, there remains a likely shortfall of between 11,479 and 15,479 dwellings up to 2031. This is because several of the 'banked' housing contributions have been reduced, as is the case with Lichfield, or have been earmarked to help meet the Black Country's needs. Analysis concludes South Staffordshire up to 4,000, Lichfield 4,500, North Warwickshire 3,790 + 620, Stratford on Avon 2,270. It should be noted that these figures are dependent on how much of South Staffordshire's 4,000 dwelling contribution can	No changes required.	Housing requirement within the Local Plan 2040 provides for the Local Housing Need (LHN) as established by the Standard Methodology and supported by evidence within the HEDNA.  Local Plan 2040 proposes to provide 2665 dwellings to meet unmet needs from the GBBCHMA with 2000 towards the shortfall arising from the Black Country. This is in addition to unmet need provided in the adopted local plan. The 2020 Position Statement identifies that the unmet need arising from the Black Country will emerging from 2027/28. Local Plan 2040 proposes four strategic allocations and includes a significant number of smaller 'saved' allocations from the current local plan which will continue to deliver significant homes to meet the housing requirement to 2040. In respect of the 35% uplift to Local Housing Need of cities this applies only to those authorities and guidance states this should not be met outside of the city authorities.
LP2040 472	Janet Rowley Clarion	SHA1	No	No	No		Yes	There is an over reliance on SHA1. Development of SHA1 will encroach into the gap between Lichfield and Fradley, enveloping Curborough and Streethay and merging the settlements into Lichfield. It is considered that Policy SHA1 and the housing trajectory should be amended to reduce the size and the yield to be delivered by this strategic allocation over the plan period and provide more dispersed growth to other sustainable locations within the District. The plan needs to further consider the housing shortfall within the HMA and consider the best geographical areas to develop as well as the fact that LDC may need to take more development on.	No changes required.	Housing trajectory within Local Plan 2040 takes a cautious approach in respect of delivery of the site.
LP2040 473	Fiona Lee McQueen (Turley) Vistry Homes Ltd	SP1	No	No	No, No, No	Yes	Yes	Vistry do not support the spatial strategy. The preferred options and policy directions paper have not been justified in the PPD. It is not appropriate for the housing requirement to set out in SP1 given SP1 provides for the spatial strategy. SP1 would be more clear and succinct by extracting the housing requirement.	No changes required.	Local Plan 2040 proposes sufficient land allocations to meet the housing requirement set out within the plan. The selection of allocations has been based upon consideration of the extensive evidence base which supports the Local Plan.
LP2040 474	Janet Rowley Clarion Housing Group	Green Belt Review	No	No	No, No, No	Yes	Yes	Supports the Green Belt Review in principle, although changes to green belt boundaries only to Fazeley and Whittington in the east of the District and there is no provision for additional housing growth adjoining the conurbation and consider this is not in compliance with NPPF para 40. LDC should be considering a higher contribution to the shortfall and this requires releasing further land from the green belt in areas with a strong functional relationship with the Black Country. Clarions land at Ogley Hay road could deliver c275 dwellings in the first 5-10 years of the Plan Period and would contribute to the Black Country' shortfall and provide a more dispersed pattern of development preventing over concentration of growth in the main settlement of Lichfield, adding a greater flexibility to the Council's housing land supply. The site forms part of Parcel BH3 and the review and site specific assessment within the Stage 2 Review includes Clarion's Land (SHLAA170) and concluded that Parcel BH3 made an important contribution to the Green Belt. Clarion disagrees with this view. It is acknowledged that the site directly abuts a large built up area of Brownhills and long term boundaries could be established due to nearby physical features - Burntwood Way/Watling St/SSSI. The site comprises an area of previously developed land in the east - ex farm buildings now used as a boarding kennel and a large area of caravan storage. Do not agree that the development of the site could not be considered to round off the settlement which extends beyond the canal to the east, to the south of Watling Street and the Quattro site and residences to the north. Whilst development would extend built development to the east it would not result in the reduction in the gap between the north of Brownhills and the south of Burntwood and therefore not lead to coalescence between the settlements. It is considered that the site does not have the character of countryside due to the proximity of existing development so would have defensible boundaries and is not considered to encroach into open countryside. Clarion agree that the site does not impact on a historic town and that the Green belt as a whole within Lichfield plays a moderate role in encouraging the recycling of derelict land.	No changes required.	Local Plan 2040 proposes sufficient land allocations to meet the housing requirement set out within the plan. The selection of allocations has been based upon consideration of the extensive evidence base which supports the Local Plan.
LP2040 475	Georgina Illsley (Heatons) - Tarmac Trading Limited	SP10	N/A	N/A	No	Yes	No	The key concern is that the strategy for identifying sites for allocation does not consider mineral extraction within the District or the need to safeguard known mineral reserves from unnecessary sterilisation. Tarmac's Alrewas Quarry will be a key source of aggregates for HS2 as well as aggregates for the planned development in the local area. Suggests that the local plan should provide further explanation as to how mineral resources will be protected. Consider that the plan is not sound as it conflicts with national policy requirements (paragraph 210 of the NPPF) which sets out that local authorities should define mineral consultation areas (MCA) which Lichfield District Council has not done.	No changes required.	Local Plan 2040 proposes sufficient land allocations to meet the housing requirement set out within the plan. The selection of allocations has been based upon consideration of the extensive evidence base which supports the Local Plan.
LP2040 476	Janet Rowley Clarion Housing Group	H2	No	No	No	Yes	Yes	As currently drafted, the housing requirement included in Policy Sp12 is not sufficient to meet the identified affordable housing needs within Lichfield District over the Plan Period, and is not in accordance with NPPF paragraph 60. The Publication Plan acknowledges that house prices in Lichfield District are significantly higher than the average for the West Midlands (para 2.8). The Council's latest Strategic Housing Market Assessment (SHMA) (November 2020) identifies that there is "an overall shortage of affordable housing of 220 affordable units per annum in Lichfield...The findings above are based on clearing the current need over the 20-years from 2016. The Councils are therefore justified in seeking to secure as much additional affordable housing as is viably possible and should test viability at a minimum 40% and reduce accordingly." It is noted that the currently adopted Local Plan Policy H2 targets the provision of 40% affordable housing across all sites. The Council's latest Monitoring Report (AMR 2020) shows gross affordable housing completion rate of only 143 dwellings per annum (Table 7.8), which has resulted in the shortfall identified within the SHMA. Publication Plan Policy H2 seeks only 20% affordable housing in most scenario's, based upon the Local Plan and CIL Viability Assessment September 2020 prepared by Dixon Searle Partnership on behalf of the Council. The delivery of only 20% affordable housing would result in only 64.2 dpa, although this would rise to 112 dpa for those scenarios where the Council would seek 35% affordable housing. This will deliver insufficient housing to make up the existing shortfall and identified need going forwards of 220 dwellings set out in the SHMA and consequently will exacerbate the shortfall across the Plan Period and fail to address the challenges of affordability identified through the SHMA. In this respect, Clarion contend that the Council have adopted the wrong approach in allocating sites that are only able to deliver 20% affordable housing. The Council should be more ambitious with the housing figures within Policy SP12 and seek to allocate a wider range of additional sites to boost overall housing supply, as well as affordable housing supply. This should include sites that are capable of delivering a higher level of affordable housing. Clarion's site at Ogley Hay Road has the ability to deliver a policy compliant level of affordable housing at 40% as well as being deliverable within the first 5-10 years of the Plan Period.	No changes required.	Local Plan 2040 proposes sufficient land allocations to meet the housing requirement set out within the plan. The selection of allocations has been based upon consideration of the extensive evidence base which supports the Local Plan.



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LP2040 477	Georgina Illsley (Heatons) - Tarmac Trading Limited	KB1	N/A	N/A	No	Yes	No	Within paragraph 15.18 of the explanatory text to policy KB1, an area of search for sand and gravel is referenced, as illustrated in inset map 14 of the Staffordshire Minerals Local Plan. The explanatory text states that 'the District Council will seek to safeguard this important area of mineral resource from sterilisation where this does not conflict with other policies in the Staffordshire Minerals Local Plan and the Lichfield District Local Plan 2040' (emphasis added). We do not consider that this is an appropriate or robust safeguarding policy to be applied to a designated area of search, whereby if in conflict with, proposed policies within the emerging Local Plan are theoretically able to supersede mineral safeguarding and mineral sterilisation. The emerging Local Plan should be informed by the adopted Minerals Local Plan, rather than be in conflict with it	No changes required.	Local Plan 2040 has been prepared in accordance with the adopted Minerals Plan. Staffordshire County Council (as the minerals authority) have been involved at all stages of plan progression through the duty to cooperate.
LP2040 478	Janet Rowley Clarion Housing Group	SP1	No	No	No	No	Yes	The Spatial Strategy - Strategic Policy 1(SP1) Clarion object to Strategic Policy 1 (SPA) as it is currently drafted on the basis of soundness, not considered that the Council's approach to the apportionment of housing growth is justified, and will not be effective in maintaining sufficient housing land supply, and is not consistent with the NPPF. To meet the proposed 9,727 housing requirement the Council proposes to direct growth within the existing built/urban areas and the key urban and rural settlements identified within levels 1, 2, 3 and 4 of the settlement hierarchy. It also identifies four strategic allocations within the existing strategic centres and larger service villages of Lichfield city, Fradley, Fazeley and Whittington. Acknowledging the principle of directing growth to Lichfield (as a Level 1 settlement), considers the Council is overly reliant on meeting housing needs through strategic growth around the city - already allocated c.60% of its growth to Lichfield in the adopted Local Plan. Of the housing growth proposed within the new strategic allocations contained in the Publication Plan, more than 70% (3,300 dwellings) is directed to the North of Lichfield. Clarion assert that to ensure a sufficient land supply across the plan period and to ensure that the Council does not rely solely on Lichfield to meet the majority of its needs, should a more balanced distribution of growth across the District, with emphasis on locations that are highly sustainable, e.g. those areas adjoining the Level 2 settlement of Burntwood and close to the administrative boundary with Walsall MB. Burntwood is the second largest settlement within the district and is identified as the only Level 2 Settlement within the District's Settlement Hierarchy and adjoins the administrative boundary with Walsall MB and has strong connections to urban areas of Chasetown, Chase Terrace and Brownhills. Burntwood is ranked as the second most sustainable settlement within the District. Paragraph 13.2 of the Publication Plan states that Burntwood lacks essential physical infrastructure, such as a bus hub and rail services but acknowledges it does have a good range a community and social infrastructure and is therefore considered to be one of the most sustainable locations within the District for housing growth. Within SP1, Table 4: Settlement Hierarchy and approach to growth, only approximately 4% of housing growth will be directed towards Burntwood over the Plan Period. Notes Burntwood is constrained by Green Belt designation and other areas of high environmental significance. Clarion supports the Council's review of Green Belt boundaries within the District, it considered that this review should be extended to also include sites adjacent to the built up areas of Burntwood and the adjoining conurbation. Identifies a lack of essential physical infrastructure and need for improvements in the town centre facilities and health care provision in Burntwood but fails to recognise that a greater quantum of new development will need to be directed towards this part of the District in order to provide the investment and support for new infrastructure and facilities and its appropriate for the Council to apportion growth to Burntwood. Clarion consider that the Council should allocate their site at Ogley Hay Road, Brownhills. The site could deliver c.275 new homes to the south of Burntwood and adjoining the main urban area of Brownhills. Not only would further housing growth in this part of the District enhance the sustainability of the second largest settlement and help with investment in physical infrastructure, it would also provide housing growth adjacent to Walsall Metropolitan Borough and contribute further towards the Black Country's shortfall both pre and post 2031.	No changes required.	Local Plan 2040 proposes sufficient land allocations to meet the housing requirement set out within the plan. The selection of allocations has been based upon consideration of the extensive evidence base which supports the Local Plan.
LP2040 479	Georgina Illsley (Heatons) - Tarmac Trading Limited	Para 15.18	N/A	N/A	No	Yes	No	As well-established mineral operators within Staffordshire and Lichfield District more specifically, Tarmac are aware of the supply and demand pressures that exist with regards to facilitating HS2 in combination with planned / unplanned development in the local area. It should be noted that part of the mineral resource within the south-western extent of the designated area of search (set out in inset map 14 of the Minerals Local Plan) is sterilised due to the proposed HS2 route. In order to continue to meet forecasted demand for sand and gravel, it likely that the existing area of search (set out in inset map 14 of the Minerals Local Plan) will be extended to cover the majority of the district to support additional sites for mineral extraction. Therefore, it is important to ensure that mineral resources within the existing designated area of search are sufficiently safeguarded. We consider that paragraph 15.18 of the emerging Local Plan should be amended to exclude compliance with 'Lichfield District Local Plan 2040'	No changes required.	Local Plan 2040 has been prepared in accordance with the adopted Minerals Plan. Staffordshire County Council (as the minerals authority) have been involved at all stages of plan progression through the duty to cooperate.
LP2040 480	Darren Bell (David Lock Associates) on behalf of Tarmac Trading Ltd (Lloyd McInally)	Whole document	No	No	No	No	Yes	At the point of publication of the draft plan evidence has not been made available by the Council to demonstrate the Council is engaged constructively, actively and on an ongoing basis with neighbouring authorities with respect to the amount of housing proposed toward unmet housing needs in the wider housing market area. National policy sets out requirements to produce, maintain and update Statements of Common Ground (SoCG) as a means to demonstrate the Duty to Cooperate. Guidance also sets out that SOCGs should be made available on councils websites when the draft plan is published and ensure it reflects the most up-to-date position. Black Country Plan was published for consultation in August and shows a shortfall and over 9,000 homes in the Green Belt. LDC has not published a SOCG with the Black Country in relation to Lichfield's Local Plan. No evidence has been made available which demonstrates that LDC has actively engaged over the proposed 2,665 contribution with the Black County authorities. There are two documents which may inform duty to cooperate but neither are adequate. The 2020 Position Statement only deals with needs up to 2031 and while it refers to emerging Black Country needs it does not expressly cover any housing contribution from authorities to meet this. Letters were published between neighbouring authorities as part of the publication of the Black Country plan. The letter with LDC is dated September 2019. No further correspondence has been made available. A review of the LDC meetings that agreed the Local Plan 2040 for consultation do not reveal any evidence on the matter, Legal advice for Tarmac Trading Ltd confirms that LDC is deficient in this matter.	No changes required.	Lichfield District Council has worked with Duty to Cooperate partners throughout the progression of the Local Plan 2040 and engaged actively and constructively. Guidance does not dictate when any statements of common ground should be published. Lichfield District Council continues to progress and prepare SOCGs where relevant and required. These will be published once such documents are available.
LP2040 481	Georgina Illsley (Heatons) - Tarmac Trading Limited	SP12	N/A	N/A	No	Yes	No	'Land to the North-east of Lichfield' (SHA1) and 'Land off Hay End Lane, Fradley' (SHA3) are both located within MSAs. Appendix D of the Sustainability Appraisal (June 2021) published as part of this consultation sets out the 'Reasonable Alternatives Housing Matrix' which has been used to assess all potential housing sites as informed by the Strategic Housing Land Availability Assessment (SHLAA). Whether the site is located within an MSA does not appear to be a consideration at any stage of the site selection process. Given the importance of mineral safeguarding as set out within this letter, it is considered that the site selection process should give due weight to designated MSAs and the importance of ensuring that mineral is not unduly sterilised.	No changes required.	Local Plan 2040 has been prepared in accordance with the adopted Minerals Plan. Staffordshire County Council (as the minerals authority) have been involved at all stages of plan progression through the duty to cooperate.
LP2040 482	James Chadwick (SCC)	SP17 - Built and Historic Environment	Unanswered	Unanswered	Unanswered	N/A	Unanswered	Support changes made following SCCs comments with regards to heritage. In paragraphs 11.11 and 11.12 would 'Heritage Statement' rather Heritage Impact Assessment would be more appropriate. Consider that SHA1 & SHA3 allocations need to take to recognise the existence of the scheduled monument located within the allocation boundary. As per previous advice (at the Preferred Options consultation stage) it is suggested that this is specifically referred to in the policy, and if this is deemed not appropriate it should be mentioned in the explanation or indeed the Concept Statement	No changes required.	Support noted.
LP2040 483	Darren Bell (David Lock Associates) on behalf of Tarmac Trading Ltd (Lloyd McInally)	Whole document	No	No	No	No	Yes	Tarmac have instructed David Tucker Associates, transport specialists and consultants to review the Councils approach. This review has found the approach to be flawed. The plan is not justified nor is it consistent with national policies because the transport assessment has not been undertaken to inform the policies and allocations of the plan. This cannot be rectified by retrospectively publishing transport evidence or undertaking further work at this stage to support the plan which has already been published. It can only be rectified by a fundamental review of the spatial strategy and the strategic housing allocations.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes specific policy and concept statement relating to the allocation which provide detailed requirements for the development. Local Plan has been progressed with engagement from stakeholders including highways authorities. Full transport evidence is in the process of being undertaken following delays due to the Coronavirus pandemic.

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LP2040 484	Darren Bell (David Lock Associates) on behalf of Tarmac Trading Ltd (Lloyd Mclnally)	Paragraph 4.40, 4.41, 4.42	No	No	No	No	Yes	Tarmac and the National Memorial Arboretum (NMA) have agreed a memorandum of understanding (MoU) over future development potential at Alrewas Quarry. Whitemoor Garden Village could deliver up to 2,000 homes, primary school, parkland and safeguard a site for a new rail station. Consider that additional land is required in this plan to meet the substantial unmet needs of the wider housing market. Whitemoor Garden Village represents a sustainable and developable option to deliver 1,275 new homes in this plan period with further delivery beyond as such it should be allocated at this plan making stage. Strategic Growth Study 2018 identified land at Fradley and land at Shenstone as potential areas of search for new settlements in Lichfield. Shenstone considered preferred able due to proximity to Birmingham, this was policy-off and ignored Green Belt. Subsequently LDC consulted on three broad options for new settlements. Fradley and Alrewas area is the most suitable option for a new settlement. Tarmac have made representation that LDC need to step back and undertake the necessary cooperation with the Black Country on unmet need, site selection, SA and establishing proportionate evidence. This would provide the opportunity to allocate a new settlement at Alrewas in this plan. There is also the option for the inclusion of a policy that commits LDC to undertake an immediate review of the plan and the necessary investigations on a new settlement.	No changes required.	Local Plan 2040 proposes sufficient land allocations to meet the housing requirement set out within the plan. The selection of allocations has been based upon consideration of the extensive evidence base which supports the Local Plan. New settlement is not part of the Spatial Strategy of the Local Plan 2040.
LP2040 485	Darren Bell (David Lock Associates) on behalf of Tarmac Trading Ltd (Lloyd Mclnally)	Policy SHA4	No	No	No	No	Yes	The reasons for allocating land for housing in the Green Belt is neither justified nor consistent with national policy. Exceptional circumstances have not been demonstrated and reasonable alternatives have exist outside of the Green Belt. This means proposed allocations SHA2 and SHA4 should be deleted from the plan. In respect of allocation SHA2 there are additional concerns - that the Green Belt Review Stage 2 finds the site to be important in preventing encroachment yet overall is assessed as moderate. there is no explanation of what weight has been attached to the importance of encroachment.	No changes required.	Local Plan 2040 sets out that exceptional circumstances required for changes to Green Belt exist. The Green Belt Review evidence base sets out the detail methodology which has been used when assessing Green Belt.
LP2040 486	Darren Bell (David Lock Associates) on behalf of Tarmac Trading Ltd (Lloyd Mclnally)	Whole document	No	No	No	No	Yes	The site selection process of selecting suitable sites has not been justified nor has it been undertaken correctly, as such site selection is not justified. Site selection paper 2019 and various editions of the SHLAA and SA use different site selection criteria. The Council should set out a single assessment of all sites considered, including alternatives, and provide a consistent basis for comparison. In addition the assessment of Whitemoor village has been erroneous even when corrected information has been provided. From the earliest stages of plan making process LDC has not reconsidered its choices. Consider site has been incorrectly assessed within the Housing Site Selection Paper 2019. Alrewas quarry site considered to be not developable in SHLAA and not taken through to SA. mineral safeguarding has not been taken into account when assessing sites. The whole site selection process needs to be re-done in a consistent, fair and comprehensive basis. The site assessments relating to Alrewas Quarry are factually incorrect or come to the wrong conclusion.	No changes required.	Local Plan 2040 proposes sufficient land allocations to meet the housing requirement set out within the plan. The selection of allocations has been based upon consideration of the extensive evidence base which supports the Local Plan.
LP2040 487	Darren Bell (David Lock Associates) on behalf of Tarmac Trading Ltd (Lloyd Mclnally)	Policy SP1	No	No	No	No	Yes	Plan is not positively prepared with regards meeting neighbouring authorities needs and the proposed housing numbers are not consistent with national policies. It is a key government objective to significantly boost the supply of homes and the NPPF also sets out that unmet needs in neighbouring areas should also taken into account when establishing the amount of housing to be planned for. Higher housing numbers to meet the wider housing market area needs were considered in earlier drafts of the plan. It is not clear why the District Council decided to reduce the target towards unmet need but reference is made to the 2020 Position Statement which provided an update in terms of unmet need. This noted unmet need from the Black Country. This has now been formalised in the draft Black Country Plan which is available for consultation until October 2021. Birmingham City Council has also determined to review its local plan to take account of the uplift in housing needs applicable to the largest urban areas. It would be prudent to engage with Birmingham to determine their shortfall. Strategy is not justified because to has not been properly considered against all reasonable alternatives. The option of smaller new settlements including garden villages has not been properly assessed.	No changes required.	Housing requirement within the Local Plan 2040 provides for the Local Housing Need (LHN) as established by the Standard Methodology and supported by evidence within the HEDNA. Local Plan 2040 provides contribution toward unmet needs arising from the GBBCHMA, contribution is considered to be appropriate and soundly based. The Preferred Options & Policy Directions and Preferred Options documents along with the explanatory text of the Local Plan 2040 set out how the contribution toward unmet need has been established.
LP2040 488	Darren Bell (David Lock Associates) on behalf of Tarmac Trading Ltd (Lloyd Mclnally)	Policy SP2	No	No	No	No	Yes	Lack of positive planning for a new rail station. Policies SP2, SP3 and/or SP4 should be amended to include reference to the re-opening of the South Staffordshire line for a new railway station at Alrewas/.NMA together with park and ride facility. Re-opening of the South Staffordshire railway line for passenger use and new rail station supported by the West Midlands Combined Authority (WMCA), West Midlands Rail Executive and Staffordshire County Council. Station at Alrewas is identified in Metropolitan Rail and Rapid Transit Network Map. West Midlands Rail Executive strategy identifies a new station at Alrewas is identified as a medium-term enhancement as a way to extend services from Lichfield to Burton. Plan should be expressly support the re-opening of the South Staffordshire railway line.	No changes required.	Local Plan 2040 supports improvements to sustainable transport modes, including new/improved rail infrastructure.
LP2040 489	Darren Bell (David Lock Associates) on behalf of Tarmac Trading Ltd (Lloyd Mclnally)	Policy SP3	No	No	No	No	Yes	Lack of positive planning for a new rail station. Policies SP2, SP3 and/or SP4 should be amended to include reference to the re-opening of the South Staffordshire line for a new railway station at Alrewas/.NMA together with park and ride facility. Re-opening of the South Staffordshire railway line for passenger use and new rail station supported by the West Midlands Combined Authority (WMCA), West Midlands Rail Executive and Staffordshire County Council. Station at Alrewas is identified in Metropolitan Rail and Rapid Transit Network Map. West Midlands Rail Executive strategy identifies a new station at Alrewas is identified as a medium-term enhancement as a way to extend services from Lichfield to Burton. Plan should be expressly support the re-opening of the South Staffordshire railway line.	No changes required.	Local Plan 2040 supports improvements to sustainable transport modes, including new/improved rail infrastructure.
LP2040 490	Darren Bell (David Lock Associates) on behalf of Tarmac Trading Ltd (Lloyd Mclnally)	Policy SP4	No	No	No	No	Yes	Lack of positive planning for a new rail station. Policies SP2, SP3 and/or SP4 should be amended to include reference to the re-opening of the South Staffordshire line for a new railway station at Alrewas/.NMA together with park and ride facility. Re-opening of the South Staffordshire railway line for passenger use and new rail station supported by the West Midlands Combined Authority (WMCA), West Midlands Rail Executive and Staffordshire County Council. Station at Alrewas is identified in Metropolitan Rail and Rapid Transit Network Map. West Midlands Rail Executive strategy identifies a new station at Alrewas is identified as a medium-term enhancement as a way to extend services from Lichfield to Burton. Plan should be expressly support the re-opening of the South Staffordshire railway line.	No changes required.	Local Plan 2040 supports improvements to sustainable transport modes, including new/improved rail infrastructure.
LP2040 491	Darren Bell (David Lock Associates) on behalf of Tarmac Trading Ltd (Lloyd Mclnally)	Policy SP11	No	No	No	No	Yes	Exceptional circumstances to alter Green Belt boundaries need to be fully evidenced and justified. Clear that also before concluding exceptional circumstances exist the authority should demonstrate it has examined all other reasonable options. LDC have not provided fully evidenced and justified case for exceptional circumstances.	No changes required.	Local Plan 2040 sets out that exceptional circumstances required for changes to Green Belt exist. The Green Belt Review evidence base sets out the detail methodology which has been used when assessing Green Belt.
LP2040 492	Darren Bell (David Lock Associates) on behalf of Tarmac Trading Ltd (Lloyd Mclnally)	Policy SP12	No	No	No	No	Yes	Policy SP12 is not effective and not consistent with national policy. There is a need to increase the housing target to 12,562 with respect of unmet needs. SP12 should reflect a higher housing number. Delivery of 3,300 dwellings on land to north-east of Lichfield have been included in housing supply figures but only 2,200 are assumed to be delivered in the plan period. Housing supply number should be reduced by 1100 for this reason. Two proposed allocations are on sites located within the Green Belt. Exceptional circumstances to alter Green Belt boundaries need to be fully evidenced and justified. Clear that also before concluding exceptional circumstances exist the authority should demonstrate it has examined all other reasonable options. LDC have not provided fully evidenced and justified case for exceptional circumstances.	No changes required.	Trajectory at Appendix A assumes delivery of 2,200 from SHA1 within the plan period.
LP2040 493	Karin Hartley (Delta Planning) - Prologis UK	FR3	Yes	Yes	No	Yes	Yes	Support FR3 insofar that it seeks to retain Fradley Business Park as a focus for employment. Consider that additional land to the south of Fradley Park should be identified for employment development to meet 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. The third paragraph of Policy FR3 states that "New development shall provide for an appropriately located multi-purpose facility that provides for a range of services and facilities". No explanation is provided in the consultation document as to what a 'multi-purpose facility' is and why it is required as part of new development. The policy wording should be amended to make this clear. We are also unsure why the fourth paragraph has been included within this policy. How is a requirement to provide additional informal play, equipped play spaces and amenity green space related to the economy and employment provision? This part of the policy should be deleted as it does not appear appropriate as part of employment developments.	No changes required.	Support noted. Local Plan 2040 identifies sufficient employment land to meet employment land requirements.
LP2040 494	Karin Hartley (Delta Planning) - Prologis UK	SP1	Yes	No	No	Yes	Yes	We consider that additional employment land should be allocated in the Local Plan to meet the employment land needs of the District and wider sub-region. Land to the immediate south of Prologis Park Fradley provides the best option for growth and should be identified as an employment allocation in the Local Plan.	No changes required.	Support noted. Local Plan 2040 identifies sufficient employment land to meet employment land requirements.



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LP2040 495	Karin Hartley (Delta Planning) - Prologis UK	LC1	Yes	Yes	No	Yes	Yes	We do not consider the Local Plan to be sound with regard to Policy LC1 with our main objection to this policy being that it is not justified. The Proposed Publication document is not supported by any evidence to justify the inclusion of a Strategic Gap, and no explanation is provided why certain areas of land have been included within this designation whilst other land is considered to be suitable for development. The effect of Policy LC1 will be to restrict any further southwards expansion of Fradley Park, one of the main employment areas in the District. We consider that the employment land needs are greater than the Local Plan and the supporting evidence suggests and that additional employment sites should be identified through the Plan to meet these requirements. Land to the south of Fradley Park offers the best option for further employment growth. We consider that the inclusion of all land immediately to the south of Fradley Park within the Strategic Gap is wholly unjustified and will have significant detrimental impacts on longer-term employment growth of the District. Robust evidence is required to justify this Strategic Gap policy looking at landscape and visual impacts and assessing the contribution of individual parcels of land to the policy objectives. Moreover, alternative strategies might be available to maintain the individual identities of Lichfield and Fradley and prevent the coalescence of these two settlements, and this needs to be fully considered before a policy approach is pursued that sterilises all land to the south of Fradley Park for employment development.	No changes required.	Local Plan 2040 identifies strategic housing allocation to north-east of Lichfield. Allocation is adjacent to strategic allocation within adopted Local Plan. Strategic Gap policy seeks to provide strategic gap between strategic allocation and the built area of Fradley to the north.
LP2040 496	Karin Hartley (Delta Planning) - Prologis UK	SP13	Yes	Yes	No	Yes	Yes	Considers that the employment land requirements are greater than the available supply set out in the ELAA. The Local Plan has not considered the increased need for employment land resulting from the provision of housing to meet the HMA shortfall, which will increase out commuting. Additionally, changes in commuting patterns have been excluded from the employment and job forecast and assessment of employment land requirements within the HEDNA. LDC should factor out commuting into its assessment of employment land requirements. The HEDNA has excluded two of the largest developments from analysis of employment land requirements, including Prologis Park Fradley. The effect of excluding the two largest developments from the analysis is a much-reduced requirement under the completion trend scenario upon which the overall conclusions set out in the HEDNA with regard to employment land requirements are partially based. These conclusions are then replicated in the current consultation document without any further consideration given to whether the Local Plan should make additional provision for large scale employment sites. The need to make land available for operators looking for large high-quality sites appears not to have played any role in the formulation of the employment land policies. The latest study on strategic employment land requirements, the West Midlands Strategic Employment Sites Study (May 2021), concluded that the availability of investor ready sites, and existing and new space under construction, is very limited and that there is a shortfall in the supply of employment land. LDC should reconsider its role in addressing the wider employment need requirements and allocate land to provide for the needs of large logistics operators. Considers that Fradley Park offers the best opportunity for additional growth. 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 proposed to be included as part of the proposed North of Lichfield Strategic Gap identified at Policy LC1 of the Draft Publication document, and we set out our objections to this designation under a separate representation. the site is unconstrained and available for development. The Council's own assessment of the site as set out in the ELAA (Site 65) shows that the site is available and achievable, and the only noted suitability constraints are its greenfield nature, current use for agricultural purposes and location within Cannock Chase SAC zone of influence.	No changes required.	Local Plan 2040 includes policies to deliver employment land to meet requirements established through evidence.
LP2040 497	Ben Cook (Pegasus) - Cooper Developments	SP1	Yes	Yes	No		Yes	The pro-active approach taken to providing a contribution of dwellings towards the GBBCHMA shortfall is welcomed along with recognition within the Policy that the Council is working under the Duty to Cooperate to address shortfalls in the wider Housing Market Area. However contribution significantly lower than at PO stage of consultation. Consistency is required within this Policy, ensuring that the policy approach of a 'minimum' housing figure for both local and HMA housing delivery is reflected throughout the plan. The approach to reduce the housing delivery contribution towards the wider HMA is therefore not supported, particularly given this approach has not been fully evidenced and justified. There is a need for Policy SP1 or a new policy drafted to provide a framework to deliver an increased number of dwellings to meet GBBCHMA's current and future housing shortfall in line with the statutory Duty to Cooperate. Consider in order to address this, an option may be to identify reserve sites should focus on deliverability and include a range of locations to give the housing market flexibility. Smaller scale sites adjacent to existing settlements are likely to be both relatively easy to deliver and also attractive to the market, whilst helping support existing infrastructure and facilities.	No changes required.	Comments noted with regards to housing numbers - DTC has been engaged with relevant authorities to ensure clear position of housing provision taken by LDC for the GBBCHMA.
LP2040 498	Ben Cook (Pegasus) - Cooper Developments	SP2	Yes	Yes	No		Yes	The principle of Policy SP2 is broadly supported, however, further consideration is required in relation to the specific wording of the policy. Clarity is required in relation to "unacceptable air quality levels" as the wording is unclear and ambiguous. The wording here should therefore be clarified, with the intention instead being that new development should not cause air quality standards to be exceeded. Although the overall principle of reducing the reliance on the car is supported in line with national policy, the wording of Policy SP2 is overly onerous and does not allow for any flexibility in line with the District's spatial strategy and the delivery of housing across the District's villages. the policy restricts much needed housing in these settlements coming forward now, where inevitably, as a result of their more rural location will require the use of the car with less regular public transport service provision than Lichfield City and the more urban areas for example. Intrinsically Lichfield is a rural district and the general approach in the Local Plan must reflect this.	No changes required.	Policy SP2 seeks to reduce the reliance from new development on private car use.
LP2040 499	Ben Cook (Pegasus) - Cooper Developments	SP3	Yes	Yes	No		Yes	The approach to sustainable travel set within Policy SP3 is broadly supported. However, the requirement for all major development proposals to produce a travel plan within Strategic Policy 3 (SP3) 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.	No changes required.	Support noted.
LP2040 500	Ben Cook (Pegasus) - Cooper Developments	LT1	Yes	Yes	No		Yes	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 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. Parking standards should be imposed through Local Plan policy rather than an SPD to allow for them to be tested at examination.	No changes required.	Parking standards are set out within adopted supplementary planning documents.
LP2040 501	Ben Cook (Pegasus) - Cooper Developments	SP5	Yes	Yes	No		Yes	The provisions of policy broadly supported, however, it is considered there needs to be additional evidence published in support of the Local Plan Review in order to provide clarity over what additional infrastructure is required to support the Local Plan allocations and how this will be delivered. Although it is recognised that an updated Infrastructure Delivery Plan (IDP) has been prepared since the publication of the Preferred Options Plan, this requires further refinement following consultation with the County Council and other relevant consultees on matters such as highways modelling and education provision. The IDP sets out that Staffordshire County Council are currently updating the Integrated Transport Strategy to consider the emerging Local Plan 2040 and that future updates of the IDP will be required to reflect this evidence once it is completed, however it is important that adequate consultation is undertaken with all the relevant stakeholders where the IDP is to be updated. It is important that an updated IDP is prepared which accurately reflects an up-to-date position with regards to the requirement for new school provision in consultation with the County Council in order that developers are provided with the clarity required to deliver the infrastructure needed to meet with both the District's and County's (as well as other statutory bodies where relevant) requirements as well ensuring that local needs are met. It is imperative that requirements remain consistent across all plan policies in relation to the delivery of infrastructure and provide an accurate and informed evidence base. The delivery of growth and associated infrastructure can only occur if proposals have been properly assessed for viability. Further work is needed on the evidence base particularly in regard to the issue of health and education provision and in relation to viability testing of potential infrastructure.	No changes required.	Emerging evidence base work will shape the IDP further in terms of refining infrastructure provision,
LP2040 502	Ben Cook (Pegasus) - Cooper Developments	INF2	Yes	Yes	No		Yes	It is important that the delivery of infrastructure is based on up-to-date evidence. Where the policy makes reference to specific evidence base and the recommendations contained there, it is important that the wording of the policy is revisited to include reference to 'up to date evidence base' as well as referring specifically to any identified 'needs of the local community' (which may be reflected through Neighbourhood Plans, for example).	No changes required.	Emerging evidence base work will shape the IDP further in terms of refining infrastructure provision,

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LP2040 503	Ben Cook (Pegasus) - Cooper Developments	SP7	Yes	Yes	No		Yes	It is important that local policies reflect and are consistent with the provisions of the relevant strategic policies. Policy SP7 reflects the importance of development providing green infrastructure, open space and playing pitches where appropriate in line with up to-date evidence but also through meeting identified local need, whether this is reflected through Neighbourhood Plans or other consultation with the local community/local evidence. Policy INF4 should be amended to reflect this important consideration and link with SP7.	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered alongside development.
LP2040 504	Ben Cook (Pegasus) - Cooper Developments	INF5	Yes	Yes	No		Yes	Important that any open space provision requirements are based on an up to date Open Space Assessment, along with any other specifically identified local needs/shortfalls, as set out within Neighbourhood Plans for example, as well as enable the opportunity for an independent Open Space Assessment to be undertaken where there isn't an up to date Open Space Assessment available.	No changes required.	Open Space assessment is updated regularly, the most recent update was published in 2020.
LP2040 505	Ben Cook (Pegasus) - Cooper Developments	SP8	Yes	Yes	No		Yes	Policy states for strategic allocations the cumulative impact of the proposal development on flood risk in relation to existing settlements, communities or allocated sites must be assessed and effecting mitigation. The wording of the Policy seems to suggest that a strategic allocation may need to mitigate existing flooding issues in a settlement. This is both unduly onerous and likely to be extremely difficult to resolve.	No changes required.	Development will be required to take account of flood risk inline with national planning policy.
LP2040 506	Ben Cook (Pegasus) - Cooper Developments	SP10	Yes	Yes	No		Yes	The approach to sustainable development set out in Policy SP10 is generally supported where it is consistent with national policy. It is considered that reference to protecting the character and distinctiveness of settlements places the potential to restrict future development and plans too great a policy hurdle for development. It would introduce the same level of protection to all settlements as locations which are in Conservation Areas. Noted that the District's Air Quality Action Plan 2019 (AQAP) forms part of the Local Plan evidence base and outlines the action which will be taken in order to improve air quality within the District. One of a list of Area Action Plan Measures, includes the use of the planning regime to minimise impact of new developments on AQMAs, including the preparation of an Air Quality SPG to be completed by the end of 2019. This forms the latest document available in relation to air quality despite the AQAP setting out that an AQAP Steering Group will ensure regular review of the AQAP, with the AQAP to be maintained as a 'live' strategy. The Proposed Publication appears to make no reference to AQAP which should be reviewed to ensure sufficient evidence and clarity in the measures needed and requirements on landowners/developers in bringing forward larger strategic and other housing developments.	No changes required.	Support noted.
LP2040 507	Ben Cook (Pegasus) - Cooper Developments	SD1	Yes	Yes	No		Yes	The approach to securing high quality design as set out in Policy SD1 is generally supported however it should be updated to reflect the Government's priorities for well-designed places set out through the National Design Guide and recent updates to the NPPF. Reference instead to enhancing "accessibility and usability" would perhaps be more appropriate in guiding the decision-making process. As set out at paragraph 7.14 of the explanatory text it is important that the policy provides clear expectations for designing high quality development. Previous Preferred Options Plan set a requirement for Masterplans to be prepared alongside strategic developments of over 100 dwellings, which was supported. Policy SD1 however provides less clarity for developers with no explanation of when the preparation of a Masterplan would be considered appropriate. It is important that the policy is able to provide clearer thresholds in relation to the preparation of masterplans and design briefs/design codes.	No changes required.	Support noted. National design guide and recent changes to NPPF published after the draft Local Plan 2040 had been prepared and published for consultation.
LP2040 508	Ben Cook (Pegasus) - Cooper Developments	SP11	Yes	Yes	No		Yes	As currently drafted, the policy covers both strategic and development management matters related to Green Belt. Amendments required to align with NPPF specifically with regards to affordable housing in the green belt.	No changes required.	Consider existing wording is NPPF compliant
LP2040 509	Ben Cook (Pegasus) - Cooper Developments	SP12	Yes	Yes	No		Yes	There has been a reduction in Lichfield's Local Housing Need by 220 dwellings in addition to a significant reduction in the Districts contribution towards the Greater Birmingham and Black Country Housing Market Area (GBBCHM) housing shortfall, with this contribution reducing from 4,500 (as identified within the Preferred Options Local Plan) to 2,665 within the current Proposed Publication document, a reduction of 1,835 dwelling. Similarly to Policy SP1 (Spatial Strategy), there is no clear justification set out within the supporting explanatory text for the significant drop in dwelling numbers since the previous iteration of the plan. It is considered that Policy SP12 should be updated, with housing delivery figures reverting back to the approach taken at the Preferred Options stage. Based on an annual dwelling requirement which takes into account both Lichfield's local housing need but also an up-to-date position in relation to meeting the wider housing markets significant unmet shortfall (in line with up-to-date evidence) across the full plan period 2018-2040. SP12 need to provide greater flexibility to accommodate potential increased housing numbers both through the Duty to Cooperate and sites not coming forward in a timely manner. 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. The Strategic Housing Allocation located to the north-east of Lichfield forms the principal housing allocation within the Local Plan Review. 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 allocation, it has not commenced on the Watery Lane site. This leads to concerns with regards to the long term delivery of this large allocation within the plan period. 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. The absence of such evidence highlights questions over the deliverability of the proposed allocation	No changes required.	Evidence, notably highways work with regards to SHA1 and other strategic allocations is emerging.
LP2040 510	Ben Cook (Pegasus) - Cooper Developments	H1	Yes	Yes	No		Yes	Concerned that Policy H1, lacks sufficient flexibility to meet changing housing needs across the district and across the plan period by virtue of its reference to specific percentage figures. It is submitted that the most appropriate approach to housing mix is to continue to be guided by market signals, as defined within the most up-to-date Strategic Housing Market Assessment (SHMA) and Employment Development Needs Assessment (HEDNA). The SHMA and HEDNA should be routinely updated across the plan period which will ensure that housing mix is reflective of market need. Evidence is currently however very high-level and it is not clear from the HEDNA how the housing mix has been established using detailed local evidence in accordance with guidance set out in the National Planning Policy Guidance (NPPG). In seeking to specify a mix, the policy currently 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. The Policy also identifies that the final housing mix can be considered against four 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.	No changes required.	Policy H1 is based upon up to date evidence within the HEDNA which details the housing mix required to meet the District's housing need based upon demographics. The policy provides flexibility within each type/size of house to ensure the policy is flexible.
LP2040 511	Ben Cook (Pegasus) - Cooper Developments	H2	Yes	Yes	No		Yes	It is noted that since the Preferred Options iteration of the plan, policy provisions in relation to affordable housing have been amended to reflect specific affordable housing percentage threshold requirements depending on the nature of development which is supported. This has been based on the findings of the Local Plan and CIL Viability Assessment (September 2020) which identifies the figure of 500 units as an appropriate quantum of development to differentiate between the level of affordable housing required on strategic and non-strategic greenfield sites (paragraph 8.24). However, it is noted that this viability assessment has been based on assumptions and a high-level assessment of the potential viability of these sites. The 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 Strategic Housing Market Assessment (SHMA) and Housing and Employment Needs Assessment (HEDNA).  Given the need to deliver much needed affordable housing delivery requirement there should also be provisions made within Policy H2 which allows greater weight in favour of granting planning permission for those developments which meet identified local need and/or deliver levels of affordable housing over and beyond plan policy requirement.	No changes required.	Policy H1 is based upon up to date evidence within the HEDNA which details the housing mix required to meet the District's housing need based upon demographics. The policy provides flexibility within each type/size of house to ensure the policy is flexible.

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LP2040 512	Ben Cook (Pegasus) - Cooper Developments	SP15 - Natural Resources	Yes	Yes	No		Yes	The approach to habitats and biodiversity is generally supported where it is consistent with national policy. SP15, Policy NR2 and Policy NR4 continue to include the biodiversity net gain requirement. The supporting text clarifies this will be assessed through Natural England's biodiversity matrix. To ensure consistency with requirements at a national level, policy wording should be amended to include reference to the Biodiversity Metric 3.0 published in July 2021 which significantly updates and improves the earlier metric in line with the biodiversity net gain requirements set out in the Environment Bill.	No changes required.	Support noted.
LP2040 513	Ben Cook (Pegasus) - Cooper Developments	NR1	Yes	Yes	No		Yes	As currently written the policy could pose restrictions for delivering much needed housing within villages and the wider rural area in line with the Plan's overall Vision and growth strategy, and in particular Strategic Objectives 1 and 2.	No changes required.	
LP2040 514	Ben Cook (Pegasus) - Cooper Developments	SP9	Yes	Yes	No		Yes	Policy SP9 is supported in the interests of conserving the natural environment, however it is important that the specific wording of the policy is in accordance with the provisions of national guidance.	No changes required.	Support noted.
LP2040 515	Ben Cook (Pegasus) - Cooper Developments	SP16	Yes	Yes	No		Yes	Policy SP16 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). In line with previous representations to the Preferred Options consultation it is noted that the policy has been amended to remove reference to the Green Belt which is supported.	No changes required.	Support noted.
LP2040 516	Darren Bell (David Lock Associates) on behalf of Tarmac Trading Ltd (Lloyd McInally)	Whole document/Sustainability appraisal	No	No	No	No	Yes	Not all reasonable strategic options were assessed at the Scope, Issues and Options Stage. New settlement option was assumed to comprise 10,000 dwelling development and as a result scored badly in respect of infrastructure provision and countryside impacts. A more modest scale of new settlement, such as garden village, (defined by Government as 1,500 dwellings +) were not assessed. This approach continued the council's current Local Plan strategy and ruled out other sites at an early stage. Options in the Preferred Options and Policy Directions document on housing requirements were geared to rule out any wider contribution beyond 4,500 dwellings.	No changes required.	Progression of the Local Plan has considered a range of reasonable alternatives throughout plan progression. This has been supported by the evidence base including sustainability appraisal at all stages.
LP2040 517	Keith Mallaber	Whole document	No	No	No	Yes	No	Comment the Council in seeking to prepare and maintain and up-to-date Local Plan. Of particular note is the objective within the vision statement which identifies that growth in the District will focus on enhancing the sustainability of our villages which is of relevance to this submission which promotes Land at Fox Lane, Alrewas. Urge the Council to revisit its housing requirement and provide a greater contribution to unmet needs given the relatively unconstrained nature of the authority. Also note that the duty to cooperate is not simply confined to housing need with commercial development also requiring consideration with the Local Plan providing an opportunity to consider and accommodate any unmet employment need. Concerns over the interpretation of the updated use class order and its implication on the HEDNA in determining employment land need. The result is the figures derived from the HEDNA cannot be considered a completely accurate reflection of class-based employment need. Contend that a higher employment need than that in the plan be considered. It is not clear where the requirement will be accommodated within the District. Review of the mapping does not indicate any further allocations. It is clear the Council considers the existing supply sufficient to meet employment need over the plan period. We urge caution in the adoption of this strategy. Completions and permissions are derived from the adopted plan and therefore should be considered in the context of meeting adopted plan needs. Council need to allocate additional deliverable employment areas in unconstrained locations such as Fradley/Alrewas. Principle area of concern is the level of proposed Green Belt release and the justification provided. Support for a new Railway Station is noted. It is noted there is a lack of transport evidence in the LPA's evidence base.	No changes required.	Support noted. Local Plan 2040 identifies sufficient employment land to meet employment land requirements.
LP2040 518	Fiona Lee McQueen (Turley) Vistry Homes Ltd	Whole Document	No	No	No	Yes	Yes	Land to the north of Tamworth is indicated as a suitable site for development as it benefits from a variety of services and facilities and clear relationship with the sustainable town of Tamworth. Vistry object to the assessment of Gillway Lane within the Housing Site Selection Paper as the site has been discounted on the basis that it is located within Wiggington which is a level 5 smaller Rural Village in the settlement hierarchy.  The updated Vision for the District no longer provide a positive vision for the future in accordance with para 15 of the NPPF.  The focus on the council having an "aspiration to deliver housing and employment growth within the district" has now been removed within the updated vision, along with any reference to meeting the needs arising from within the housing market area. It is disappointing that the Vision for the district has been 'watered' down and reflects the council's move away from delivering an ambitious Local Plan and away from being a 'pro-growth' local authority.  The vision should acknowledge the role Tamworth plays as one of the largest towns in Staffordshire in providing sustainable areas of growth within LDC.  The strategic objectives and priorities reflect the updated approach to sustainable communities and placing more importance on creating a single sustainable urban extension for Lichfield city, and reducing need for further Green Belt release. The strategic objectives do not make any reference to the housing needs arising from GBBCHMA, including those of Tamworth.	No changes required.	Local Plan 2040 proposes sufficient land allocations to meet the housing requirement set out within the plan. The selection of allocations has been based upon consideration of the extensive evidence base which supports the Local Plan.
LP2040 519	Fiona Lee McQueen (Turley) Vistry Homes Ltd	SP12	No	No	No	Yes	Yes	The first para of SP12 sets out the proposed housing requirement between 2018 and 2040. Given that SP12 provides for 'Housing Provision' is it not necessary for the housing requirements to be set out here.  The housing requirement is a reduction on that proposed within the PO consultation which proposed 11,800 dwellings which is a reduced contribution towards the GBBCHMA unmet needs. The Council has recognised that it will be required to separately address both local housing needs and contribute towards the unmet needs within the GBBCHMA. This position is strongly supported in principle but Vistry objects to the level of housing requirement in terms of both the minimum local housing need and the contribution towards the unmet needs of the GBBCHMA. Neither are positively prepared, justified nor consistent with national policy and, therefore, are unsound. While the Council commissioned the HEDNA to examine the need to depart from the standard method, it exclusively considered the relationship with future job growth and fails to take account of both past delivery and previous assessments of need. proposed housing delivery underestimated according to past trajectory and also requirement from GBBCHMA. No justification as to why methodology used in HEDNA used. Any HMA contribution must therefore be clearly stated in policy, not simply explanatory text. The overall housing requirement is only meeting Lichfield's needs. Lichfield needs to contribute more as outlined in the falling short report.	No changes required.	Local Plan 2040 proposes sufficient land allocations to meet the housing requirement set out within the plan. The selection of allocations has been based upon consideration of the extensive evidence base which supports the Local Plan.
LP2040 520	Fiona Lee McQueen (Turley) Vistry Homes Ltd	H1	No	No	No	Yes	Yes	Vistry welcome the importance placed on providing a balanced housing market through mix of sizes, types, tenures and values whilst optimising density.  Vistry welcome the acknowledgment in the PPD that the final mix of housing will be subject to further negotiation between the applicant and the District Council during the planning application stage.  Vistry agree that development proposals must make the most efficient use of land and be developed at the optimum density in accordance with paragraphs 124 and 125 of the NPPF.	No changes required.	Support noted.

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LP2040 521	Fiona Lee McQueen (Turley) Vistry Homes Ltd	H2	No	No	No	Yes	Yes	<p>The scale and distribution of affordable housing is not positively prepared, justified nor effective.</p> <p>Paragraph 8.23 of the Publication Document states that "there is an affordable housing need of 220 units per year, which over the plan period is 4,480 units". This is incorrect as the plan period is twenty two years from 2018 to 2040. When modified to take into account the full plan period, the affordable housing need is 4,840 units (i.e. an increase of 440 affordable homes). This will need to be amended in the Submission Version to ensure the LP is, as a minimum, seeking to meet the district's objectively assessed needs.</p> <p>Whilst Local Policy H2 sets out the level of affordable housing to be provided by the strategic allocations, it is clear that there is still a 'gap' in number of affordable homes to be provided against the actual need (as set out in paragraph 3.75 above). It is considered that further strategic sites should be allocated to assist in the much needed delivery of affordable homes with the District. By allocating a wider range of sites including those of a scale such as Gillway Lane, which are relatively straightforward to deliver, the District Council will ensure that the delivery of affordable housing in the district is more viable</p>	No changes required.	Policy H2 is based upon up top date evidence within the HEDNA. This makes clear the affordable housing requirements for each scenario and is based on technical evidence.
LP2040 522	Neil Cox (Evolve Planning) on behalf of Richborough Estates	Vision, Strategic Objectives & Priorities	Yes	Yes	No	Yes	Yes	<p>It is noted that Vision contained within the Publication Local Plan remains broadly consistent to that contained within the adopted Local Plan Strategy and that set out in the 'Preferred Options' consultation document. It is considered that it remains relevant and is broadly supported.</p> <p>To improve clarity, the separate settlement specific vision statements should be signposted and their relationship with the overarching District-wide vision explained.</p> <p>Overall, the Local Plan would benefit from clearer referencing and links throughout in order to clearly demonstrate how the spatial strategy relates back to the Vision and Strategic Objectives. For example, it is recommended that the relevant Strategic Objectives are identified in relation to each policy or chapter to reflect the approach taken in the adopted Local Plan Strategy.</p>	No changes required.	Comments noted. Relevant Strategic Objectives are identified at the end of each chapter of the Local Plan 2040 document.
LP2040 523	Neil Cox (Evolve Planning) on behalf of Richborough Estates	SP1	Yes	Yes	No	Yes	Yes	<p>Lichfield District's Local Housing Need approach is supported although it is recognised that the HEDNA concludes the Standard Method represents the minimum housing need, however Lichfield District Council is "encouraged to exceed this need with more provisions." The evidence demonstrates the local housing need for Lichfield District will be higher than that suggested by the standard method. It is not clear how the figure of 2,665 dwellings has been determined and why the level of provision has decreased from the 4,500 contribution set out at the Preferred Options stage. It is not clear why paragraph 4.22 refers to a "capped contribution of 2,000" to be made "for the Black Country Authorities' needs starting after 2027" and how this relates to the 2,665 dwelling contribution identified within Strategic Policy 1. It is also not clear how this relates back to the original options identified.</p> <p>The Strategic Growth Study identified six areas of search within Lichfield District. Other LPAs (South Staffordshire DC and Cannock Chase DC) have utilised the Strategic Growth Study to inform a contribution to the shortfall by applying a minimum figure for each recommended area of search identified for an authority area within the study. Paragraph 4.21, makes reference to a Position Statement published in July 2020 which details that the need arising from Birmingham in particular has primarily now been met. It should be recognised that this statement was prepared prior to the Government changes to the standard method in December 2020.</p> <p>There is a need for Strategic Policy 1, or a new policy drafted, to provide a framework to deliver an increased number of dwellings to meet GBBCHMA's current and future housing shortfall in line with the statutory Duty to Cooperate. One solution to address this issue is to identify parameters that would result in the need to review the plan or provide flexibility through the identification of a series of reserve sites which could come forward through the identification of clear monitoring indicators and triggers. The identification of reserve sites should focus on deliverability and include a range of locations, consistent with the Town and Key Rural Villages Focused Growth scenario.</p> <p>The hierarchy is supported by evidence contained within the Settlement Sustainability Study (October 2018) and is supported by Richborough Estates as 'sound'.</p> <p>The recognition of the need to release Green Belt in Fazeley/Mile Oak/Bonehill and Whittington is welcomed and it is clear that the Council can demonstrate exceptional circumstances justification for such release. Richborough Estates agrees that the Green Belt Review undertaken by the Council provides a comprehensive review of the Green Belt within Lichfield District to inform these strategic changes</p>	No changes required.	Local Plan 2040 proposes to provide 2665 dwellings to meet unmet needs from the GBBCHMA with 2000 towards the shortfall arising from the Black Country. This is in addition to unmet need provided in the adopted local plan. Previous consultation documents set out consideration of Strategic Growth Study options alongside wider evidence base material. District Council will prepare statements of common ground with those partners.
LP2040 524	Neil Cox (Evolve Planning) on behalf of Richborough Estates	Paragraph 6.10	Yes	Yes	No	No	Yes	<p>The Local Plan recognises at paragraph 6.10 that developer contributions will have a significant role to play in infrastructure delivery, through both S106 Agreements and the Community Infrastructure Levy. Richborough Estates agrees with this statement.</p>	No changes required.	Support noted.
LP2040 525	Neil Cox (Evolve Planning) on behalf of Richborough Estates	Vision for Fazeley, Mile Oak and Bone Hill	Yes	Yes	No	No	Yes	<p>The Vision for Fazeley, Mile Oak and Bonehill seeks the communities of Fazeley to be more prosperous and better connected by attractive green space and improved active transport links and have an improved level of open space to meet their needs. The Concept Statement for Land West of Fazeley, Mile Oak and Bonehill and the IDP sets out infrastructure requirements in respect of the delivery of the Strategic Housing Allocation.</p> <p>Richborough Estates can confirm that delivery of the Strategic Housing Allocation at Mile Oak has the ability to satisfy the relevant infrastructure requirements set out in the Local Plan which, in turn, will assist in delivering the identified Vision for Fazeley, Mile Oak and Bonehill.</p> <p>The Local Plan, through the IDP and Concept Statements, provides a guide to infrastructure expectations with regard to the Strategic Housing Allocations. Strategic Policy 5 and Local Policies INF1 and INF2 are therefore supported as 'sound.'</p>	No changes required.	Support noted. Confirmation of satisfaction of infrastructure requirements for SHA2 noted.
LP2040 526	Neil Cox (Evolve Planning) on behalf of Richborough Estates	SP6	Yes	Yes	No	Yes	Yes	<p>It is recommended that Strategic Policy 6 is renamed 'Delivery of Healthy Communities' to avoid duplicating Strategic Policy 5.</p>	No changes required.	Comments noted. Policy name/numbering considered appropriate.
LP2040 527	Neil Cox (Evolve Planning) on behalf of Richborough Estates	SP10	Yes	Yes	No	Yes	Yes	<p>The approach to sustainable development, set out in Strategic Policy 10, 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 states that "no decline in standards being deemed acceptable as a result of new development." This wording is not clear, it is suggested should be clarified that its intention is that new development should not cause air quality limit values to be exceeded.</p>	No changes required.	Consider the policy wording as drafted is clear and appropriate.
LP2040 528	Neil Cox (Evolve Planning) on behalf of Richborough Estates	SD1	Yes	Yes	No	Yes	Yes	<p>The approach to securing high quality design as set out in SD1 is generally supported however it is not clear how the criteria relate to the Government's priorities for well-designed places set out through the National Design Guide. The National Design Guide recognises at paragraph 10 that "specific, detailed and measurable criteria for good design are most appropriately set out at the local level" and to improve legibility. Whilst this isn't an issue that goes to the heart of 'soundness' it may be more appropriate to structure the local criteria around the ten characteristics that reflect the Government's priorities set out in the National Design Guide.</p>	No changes required.	National Design Guide and National Design Code published after Local Plan 2040 prepared. Not considered a soundness issue.
LP2040 529	Neil Cox (Evolve Planning) on behalf of Richborough Estates	SP11	Yes	Yes	No	Yes	Yes	<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 be amended to comply with national policy. It is suggested the reference to Green Belt changes at Whittington and Fazeley/Mile Oak/Bonehill is removed as this is set out through Strategic Policy 1.</p>	No changes required.	Policy reflects national policy on Green Belt. Consider it is appropriate to references changes to Green Belt boundary within the Green Belt strategic policy alongside the spatial strategy strategic policy.



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LP2040 530	Neil Cox (Evolve Planning) on behalf of Richborough Estates	SP12	Yes	Yes	No	Yes	Yes	<p>Strategic Policy 12 is proposing a stepped trajectory with an annual requirement of 321 dwellings per annum prior to 2027 and 526 dwellings per annum thereafter. In respect of the proposed stepped trajectory, no evidence has been published to support the deferred delivery of the housing requirement, whereas evidence has been published which demonstrates an unmet housing need exists within the wider GBBCHMA now, which should be addressed as a matter of urgency.</p> <p>To boost supply, there are four strategic development allocations listed in the policy alongside the approximate number of new homes they will deliver. Whilst these allocations reflect the new allocations for growth identified in SP1, it is not clear how the proposed allocations relate to the 'Town and Key Rural Villages Focused Development' spatial strategy and the identified settlement hierarchy.</p> <p>The proposed strategy is heavily reliant on a small number of allocations to deliver a significant proportion of the identified housing requirement. Further allocations should be identified, in line with the 'Town and Key Rural Villages Focused Development' strategy and the settlement hierarchy to ensure a balanced delivery of the housing requirement to 2040. Additional smaller sites, that are not reliant upon the delivery of strategic infrastructure, would assist in boosting supply in the short term, prior to 2027.</p> <p>Table 7 (Housing Delivery) demonstrates that Fazeley, Mile Oak and Bonehill has only achieved seven completions since 2018 and the committed supply is heavily reliant upon the delivery of a scheme at Tolsons Mill which has remained a commitment over a long period of time. Due to Fazeley, Mile Oak and Bonehill being surrounded by the West Midlands Green Belt opportunities for growth are severely restricted and therefore identification of the Strategic Housing Allocation is necessary to ensure proportionate growth and the retention and enhancement of local services and facilities to meet local needs.</p> <p>The identification of Land West of Fazeley, Mile Oak and Bonehill Strategic Housing Allocation is supported as 'sound.' This proposed allocation supports proportionate growth in this sustainable Level 3 settlement in line with the proposed town and key rural village focused spatial strategy.</p>	No changes required.	<p>Local Plan 2040 proposes to provide 2665 dwellings to meet unmet needs from the GBBCHMA with 2000 towards the shortfall arising from the Black Country. This is in addition to unmet need provided in the adopted local plan. The 2020 Position Statement identifies that the unmet need arising from the Black Country will emerging from 2027/28. Explanatory text within the plan sets out that the stepped approach is based upon local evidence of delivery and the 2020 Position Statement. Evidence on recent delivery suggests there has been a significant increase, however when compared over the plan period as a whole the average delivery is lower. Considered appropriate to consider delivery over the medium-long term. Local Plan 2040 proposes four strategic allocations and includes a significant number of smaller 'saved' allocations from the current local plan which will continue to deliver significant homes to meet the housing requirement to 2040.</p>
LP2040 531	Neil Cox (Evolve Planning) on behalf of Richborough Estates	Policy H1	Yes	Yes	No		Yes	<p>Concerned that in its current form this policy, through reference to specific percentage figures, lacks sufficient flexibility to meet changing housing needs across the District and 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 SHMA and HEDNA. 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>It appears the mix set out for Affordable Homes (ownership) is not aligned to the recommendations contained within the latest HEDNA. This may be a simple typographical error where the mix for Tamworth has been transposed instead of those that relate to Lichfield.</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 broadly appropriate, recognising that lower densities in rural locations may be acceptable if required to be compatible with good design and to reflect existing settlement patterns and the character of an area.</p>	Minor modification proposed to text of Policy H2 to correct typographical error in relation to the recommended proportion of Affordable Homes (ownership) where the recommended percentage from the HEDNA evidence has not correctly been transferred to policy. Minor modification to correct this factual error to be proposed.	<p>Policy H1 is based upon up to date evidence within the HEDNA which details the housing mix required to meet the District's housing need based upon demographics. The policy provides flexibility within each type/size of house to ensure the policy is flexible. It is not considered appropriate to further split this by sub-markets as no such evidence is available and it is suggested such an approach would overly complicate the policy. Factual error within the table in the policy noted. Minor modification to correct this factual error to be proposed.</p>
LP2040 532	Neil Cox (Evolve Planning) on behalf of Richborough Estates	Policy H2	Yes	Yes	No		Yes	<p>The varying affordable housing targets appear overly complex however it is recognised that targets have been informed by a plan-wide viability appraisal.</p> <p>The 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/ HEDNA.</p> <p>Richborough Estates can confirm that 20% affordable housing on Land South of Hints Road, Mile Oak is financially viable.</p>	No changes required.	<p>Affordable housing requirements for strategic sites are based upon evidence. Confirmation of financial viability of affordable housing for SHA2 noted.</p>
LP2040 533	Neil Cox (Evolve Planning) on behalf of Richborough Estates	SHA2	Yes	Yes	No	Yes	Yes	<p>The allocation of SHA2 is supported by Richborough Estates as sound. Policy SHA2 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 clear, or in accordance with national policy or guidance:</p> <p>'Integrate the development into the existing landscape including the creation of vistas through the site'. Richborough Estates supports the principle of integrating the development within the existing landscape. However, the requirement to create vistas through the site is questioned. The Council's landscape evidence does not suggest that there are any important views across the site that would justify the provision of formal vistas. The masterplan for the site demonstrates the provision of a number of green corridors that traverse the site.</p> <p>'Safeguard and enhance existing trees, hedgerows and sites of biodiversity value within the site'. The principle of safeguarding and enhancing existing trees and hedgerows on the site is supported by Richborough Estates. However, it should be made clear that this requirement should only apply to trees and hedges of high quality. It is not clear what is meant by 'sites of biodiversity value within the site'. This should perhaps be referenced as 'other habitats of biodiversity value.'</p> <p>'Preserve or enhance the historic environment and improve our understanding of it'. Chapter 16 of the NPPF sets out the Government's approach to the historic environment. It is suggested that the Local Plan should be amended to refer back to this; there is no national requirement for development to improve understanding of the historic environment. This is not clear or demonstrable. This criterion also makes reference to the 'adjacent' Conservation Area. The closest Conservation Area to this Strategic Housing Allocation is the Bonehill Conservation Area which lies approximately 1km to the east. The Hints Conservation Area is approximately 1.2km to the west.</p> <p>'Provision of a detailed hydraulic model of the Bourne Brook will be required within a Flood Risk Assessment for the development site'. Richborough Estates recognises the site is in reasonable proximity to that watercourse, however the proposed development seeks to provide sufficient drainage capacity to provide for the scale of development, and that this is not justified from a site flood risk perspective or from an outfall suitability perspective. Richborough Estates considers the development can be designed to achieve a discharge at the Mean Annual Greenfield Runoff (QBAR) rate which, given the topography of the site, will provide a considerable improvement to the existing rate of discharge from the site in rainfall events greater than the 1:2 year event. In addition, it should be noted that the emerging development proposals seek to provide a development offset at the south of the site, ensuring that the development edge is set back from the Bourne Brook. It is therefore requested that this policy requirement is removed.</p>	No changes required.	<p>Support noted.</p>



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LP2040 534	Neil Cox (Evolve Planning) on behalf of Richborough Estates	Sustainability Appraisal	Yes	Yes	No	Yes	Yes	<p>The Proposed Submission Local Plan 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 Employment Growth Option 2 but there is no clear explanation of how the selections were made and how this represents a balanced, sustainable strategy. There is also no explanation of how the 2,665 dwellings contribution towards the GBBCHMA shortfall has been determined.</p> <p>The SA considers reasonable alternatives sites however, a number of inconsistencies/errors have been identified within the SA that should be rectified:</p> <ul style="list-style-type: none"><li>• The SA assumes areas of safeguarded land will be identified at Burntwood, Lichfield and Fazeley (Paragraph 2.4.7). This is not the case and probably reflects a version of the Local Plan considered by Cabinet earlier in the year.</li><li>• The assumptions that relate to SA Objective 14 do not have regard to the settlement hierarchy in that Kings Bromley, Hopwas and Stonnall are listed as Level 5 settlements. They are Level 4 settlements as concluded within the Settlement Sustainability Study (October 2018).</li><li>• Scoring in respect of Whittington sites appears to be inaccurate with greenfield sites being assessed to be previously developed.</li></ul> <p>The above issues will need to be rectified within the SA prior to submission to the Secretary of State.</p>	No changes required.	Comments noted. Submission of Local Plan will be accompanied by Sustainability Appraisal/Assessment.
LP2040 535	Neil Cox (Evolve Planning) on behalf of Richborough Estates	Green Belt Review	Yes	Yes	No	No	Yes	<p>The Green Belt Review recognises the Preferred Options Local Plan (November 2019) proposed a number of sites to be removed from the Green Belt to meet development needs beyond the plan period. Supporting paragraph 16.7 noted that the 2019 Green Belt Review informed the planning judgement undertaken in relation to the proposed changes to the Green Belt boundary</p> <p>The Green Belt Review conclusion is supported by Richborough Estates and reflects our own assessment. This assessment, undertaken by Zebra Landscape Architects concludes that the release is justified as there would little or no harm to settlement identity or separation between Mile Oak, Tamworth and outlying settlements and well-defined boundaries can contain future development and limit harm to the Green Belt function.</p>	No changes required.	Support noted.
LP2040 536	Neil Cox (Evolve Planning) on behalf of Richborough Estates	Whole Document	Yes	Yes	No		Yes	<p>Promotional documents, indicative masterplan and supporting evidence has been produced in support of SHA2 and should be read alongside these representations.</p> <p>In relation to SHA2 it has been demonstrated that access to land south of Hints Road is achievable for all modes via footways and junctions with Hints Road and Roman Road. The development site will include a local centre and country park. With the neighbouring development in place access will be promoted from the site including to the planned primary school and local centre. Walk, cycle and vehicle movement would also be possible through the site to Sutton Road, increasing permeability and spreading traffic impact.</p> <p>Previous work has identified issues at the A453/B5404 signalled junction. Applying just background traffic growth the existing junction was predicted to operate beyond its practical capacity. When tested with an additional 807 dwellings (the wider Strategic Housing Allocation) the junction failed. It is therefore considered a significant improvement at this location in the form of a signalled gyratory junction is required. The junction was tested with background traffic growth and emerging Local Plan development traffic along with the dwellings proposed within the Strategic Housing Allocation. The junction was predicted to operate within capacity at the 2040 assessment year with the stated level of growth/development included in traffic forecasts. The gyratory has been designed to allow pedestrians and cyclists to cross the junction under signal control, with the finalised design yet to be fully worked up.</p> <p>It is not considered that any specific views valued highly by the general public or essential to the appreciation of the area (in terms of openness or otherwise), would be unduly harmed by the proposed development.</p> <p>It is considered that the release of the site from the Green Belt is justified as there would be little or no harm to settlement identity or separation between Mile Oak, Tamworth and outlying settlements and well-defined boundaries can contain future development and limit harm to the Green Belt function.</p> <p>Land West of Fazeley, Mile Oak and Bonehill represents a logical, sustainable extension to the settlement and has the ability to accommodate a proportion of the future housing needs of the area, in line with the proposed Local Plan housing requirement and the housing needs outlined in the HEDNA.</p>	No changes required.	Support noted. Information and comments relating to proposed allocation noted.
LP2040 537	Ben Cook (Pegasus) on behalf of Richborough Estates	SP1	Yes	Yes	No		Yes	<p>Overall, the Policy SP1 sets out that growth will be directed towards sustainable locations broadly in accordance with the settlement hierarchy. This is supported by Richborough Estates as a 'sound' approach to distributing growth in a sustainable manner. The pro-active approach taken to providing a contribution of dwellings towards the GBBCHMA shortfall is welcomed along with recognition within the Policy that the Council is working under the Duty to Cooperate to address shortfalls in the wider Housing Market Area.</p> <p>However contribution significantly lower than at PO stage of consultation. Consistency is required within this Policy, ensuring that the policy approach of a 'minimum' housing figure for both local and HMA housing delivery is reflected throughout the plan. The approach to reduce the housing delivery contribution towards the wider HMA is therefore not supported, particularly given this approach has not been fully evidenced and justified. There is a need for Policy SP1 or a new policy drafted to provide a framework to deliver an increased number of dwellings to meet GBBCHMA's current and future housing shortfall in line with the statutory Duty to Cooperate.</p> <p>Consider in order to address this, an option may be to identify reserve sites should focus on deliverability and include a range of locations to give the housing market flexibility. Smaller scale sites adjacent to existing settlements are likely to be both relatively easy to deliver and also attractive to the market, whilst helping support existing infrastructure and facilities.</p>	No changes required.	<p>Housing requirement within the Local Plan 2040 provides for the Local Housing Need (LHN) as established by the Standard Methodology and supported by evidence within the HEDNA.</p> <p>Local Plan 2040 proposes to provide 2665 dwellings to meet unmet needs from the GBBCHMA with 2000 towards the shortfall arising from the Black Country. This is in addition to unmet need provided in the adopted local plan. The 2020 Position Statement identifies that the unmet need arising from the Black Country will emerging from 2027/28. Local Plan 2040 proposes four strategic allocations and includes a significant number of smaller 'saved' allocations from the current local plan which will continue to deliver significant homes to meet the housing requirement to 2040. In respect of the 35% uplift to Local Housing Need of cities this applies only to those authorities and guidance states this should not be met outside of the city authorities.</p>
LP2040 538	Ben Cook (Pegasus) on behalf of Richborough Estates	SP2	Yes	Yes	No		Yes	<p>The principle of Policy SP2 is broadly supported, however, further consideration is required in relation to the specific wording of the policy. Clarity is required in relation to "unacceptable air quality levels" as the wording is unclear and ambiguous. The wording here should therefore be clarified, with the intention instead being that new development should not cause air quality standards to be exceeded. Although the overall principle of reducing the reliance on the car is supported in line with national policy, the wording of Policy SP2 is overly onerous and does not allow for any flexibility in line with the District's spatial strategy and the delivery of housing across the District's villages. the policy restricts much needed housing in these settlements coming forward now, where inevitably, as a result of their more rural location will require the use of the car with less regular public transport service provision than Lichfield City and the more urban areas for example. Intrinsically Lichfield is a improvement at this location in the form of a signalled gyratory junction is</p>	No changes required.	Support noted. District Council is to progress supplementary planning guidance in relation to air quality.
LP2040 539	Ben Cook (Pegasus) on behalf of Richborough Estates	SP3	Yes	Yes	No		Yes	<p>The approach to sustainable travel set within Policy SP3 is broadly supported. However, the requirement for all major development proposals to produce a travel plan within Strategic Policy 3 (SP3) 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.</p>	No changes required.	Support noted.

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LP2040 540	Ben Cook (Pegasus) on behalf of Richborough Estates	LT1	Yes	Yes	No		Yes	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 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. Parking standards should be imposed through Local Plan policy rather than an SPD to allow for them to be tested at examination.	No changes required.	Comments noted. Local Plan 2040 does not set out parking standards. Parking Standards are contained within supplementary planning documents.
LP2040 541	Ben Cook (Pegasus) on behalf of Richborough Estates	SP5	Yes	Yes	No		Yes	The provisions of policy broadly supported, however, it is considered there needs to be additional evidence published in support of the Local Plan Review in order to provide clarity over what additional infrastructure is required to support the Local Plan allocations and how this will be delivered. Although it is recognised that an updated Infrastructure Delivery Plan (IDP) has been prepared since the publication of the Preferred Options Plan, this requires further refinement following consultation with the County Council and other relevant consultees on matters such as highways modelling and education provision. The IDP sets out that Staffordshire County Council are currently updating the Integrated Transport Strategy to consider the emerging Local Plan 2040 and that future updates of the IDP will be required to reflect this evidence once it is completed, however it is important that adequate consultation is undertaken with all the relevant stakeholders where the IDP is to be updated. It is important that an updated IDP is prepared which accurately reflects an up-to-date position with regards to the requirement for new school provision in consultation with the County Council in order that developers are provided with the clarity required to deliver the infrastructure needed to meet with both the District's and County's (as well as other statutory bodies where relevant) requirements as well ensuring that local needs are met. It is imperative that requirements remain consistent across all plan policies in relation to the delivery of infrastructure and provide an accurate and informed evidence base. The delivery of growth and associated infrastructure can only occur if proposals have been properly assessed for viability. Further work is needed on the evidence base particularly in regard to the issue of health and education provision and in relation to viability testing of potential infrastructure.	No changes required.	Emerging evidence base work will shape the IDP further in terms of refining infrastructure provision.
LP2040 542	Ben Cook (Pegasus) on behalf of Richborough Estates	INF2	Yes	Yes	No		Yes	It is important that the delivery of infrastructure is based on up-to-date evidence. Where the policy makes reference to specific evidence base and the recommendations contained there, it is important that the wording of the policy is revisited to include reference to 'up to date evidence base' as well as referring specifically to any identified 'needs of the local community' (which may be reflected through Neighbourhood Plans, for example)	No changes required.	Local Plan 2040 includes policies which seek to deliver appropriate infrastructure to support development. Infrastructure Funding Statement will be published annually as required by national guidance. The Infrastructure Delivery Plan is a 'living' document which will be updated to take account of the latest information where appropriate. Local Plan 2040 includes policies which seek to ensure appropriate infrastructure is delivered alongside development.
LP2040 543	Ben Cook (Pegasus) on behalf of Richborough Estates	SP7	Yes	Yes	No		Yes	Support policy SP7, reiterate the importance of development providing green infrastructure, open space and playing pitches where appropriate in line with up-to-date evidence but also through meeting identified local need, whether this is reflected through Neighbourhood Plans or other consultation with the local community/local evidence.	No changes required.	Support noted.
LP2040 544	Ben Cook (Pegasus) on behalf of Richborough Estates	INF4	Yes	Yes	No		Yes	Policy INF4 reflects the importance of development providing green infrastructure, open space and playing pitches where appropriate in line with up-to-date evidence but also through meeting identified local need, whether this is reflected through Neighbourhood Plans or other consultation with the local community/local evidence. Policy INF4 should be amended to reflect this important consideration.	No changes required.	Open Space assessment is updated regularly, the most recent update was published in 2020. Updated playing pitch evidence supports the Local Plan 2040.
LP2040 545	Ben Cook (Pegasus) on behalf of Richborough Estates	INF5	Yes	Yes	No		Yes	Support Open Space requirements policy. Has some implications for Kings Bromley where the Richborough site adjoins the existing cricket club and there is potential scope to provide additional facilities to support the sports use in conjunction with new development at the site.	No changes required.	Open Space assessment is updated regularly, the most recent update was published in 2020. Updated playing pitch evidence supports the Local Plan 2040.
LP2040 546	Ben Cook (Pegasus) on behalf of Richborough Estates	SP8	Yes	Yes	No		Yes	Policy states for strategic allocations the cumulative impact of the proposal development on flood risk in relation to existing settlements, communities or allocated sites must be assessed and effecting mitigation. The wording of the Policy seems to suggest that a strategic allocation may need to mitigate existing flooding issues in a settlement. This is both unduly onerous and likely to be extremely difficult to resolve.	No changes required.	Development will be required to take account of flood risk inline with national planning policy.
LP2040 547	Ben Cook (Pegasus) on behalf of Richborough Estates	SP10	Yes	Yes	No		Yes	The approach to sustainable development set out in Policy SP10 is generally supported where it is consistent with national policy. It is considered that reference to protecting the character and distinctiveness of settlements places the potential to restrict future development and plans too great a policy hurdle for development. It would introduce the same level of protection to all settlements as locations which are in Conservation Areas. Noted that the District's Air Quality Action Plan 2019 (AQAP) forms part of the Local Plan evidence base and outlines the action which will be taken in order to improve air quality within the District. One of a list of Area Action Plan Measures, includes the use of the planning regime to minimise impact of new developments on AQMAs, including the preparation of an Air Quality SPG to be completed by the end of 2019. This forms the latest document available in relation to air quality despite the AQAP setting out that an AQAP Steering Group will ensure regular review of the AQA, with the AQAP to be maintained as a "live" strategy. The Proposed Publication appears to make no reference to AQAP which should be reviewed to ensure sufficient evidence and clarity in the measures needed and requirements on landowners/developers in bringing forward larger strategic and other housing developments.	No changes required.	Support noted.
LP2040 548	Ben Cook (Pegasus) on behalf of Richborough Estates	SD1	Yes	Yes	No		Yes	The approach to securing high quality design as set out in Policy SD1 is generally supported however it should be updated to reflect the Government's priorities for well-designed places set out through the National Design Guide and recent updates to the NPPF. Reference instead to enhancing "accessibility and usability" would perhaps be more appropriate in guiding the decision-making process. As set out at paragraph 7.14 of the explanatory text it is important that the policy provides clear expectations for designing high quality development. Previous Preferred Options Plan set a requirement for Masterplans to be prepared alongside strategic developments of over 100 dwellings, which was supported. Policy SD1 however provides less clarity for developers with no explanation of when the preparation of a Masterplan would be considered appropriate. It is important that the policy is able to provide clearer thresholds in relation to the preparation of masterplans and design briefs/design codes.	No changes required.	National Design Guide and National Design Code published after Local Plan 2040 prepared. Not considered a soundness issue.
LP2040 549	Ben Cook (Pegasus) on behalf of Richborough Estates	SP11	Yes	Yes	No		Yes	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 be amended to comply with national policy. When referring to the inappropriate construction of new buildings in the Green Belt and the exceptions to this rule, the policy includes specific reference to the provision of affordable housing on small rural exception sites. This however should be reworded to ensure it is consistent with the provisions of the NPPF. The NPPF (2021) at Paragraph 149 however allows for greater flexibility with regards to the delivery of affordable housing which is not restricted to the provision of affordable housing on rural exception sites, setting out that "limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites)".	No changes required.	Policy in relation to Green Belt is considered to be consistent with national planning policy.

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LP2040 550	Ben Cook (Pegasus) on behalf of Richborough Estates	SP12	Yes	Yes	No		Yes	<p>There has been a reduction in Lichfield's Local Housing Need by 220 dwellings in addition to a significant reduction in the Districts contribution towards the Greater Birmingham and Black Country Housing Market Area (GBBCHM) housing shortfall, with this contribution reducing from 4,500 (as identified within the Preferred Options Local Plan) to 2,665 within the current Proposed Publication document, a reduction of 1,835 dwelling. Similarly to Policy SP1 (Spatial Strategy), there is no clear justification set out within the supporting explanatory text for the significant drop in dwelling numbers since the previous iteration of the plan. It is considered that Policy SP12 should be updated, with housing delivery figures reverting back to the approach taken at the Preferred Options stage. Based on an annual dwelling requirement which takes into account both Lichfield's local housing need but also an up-to-date position in relation to meeting the wider housing markets significant unmet shortfall (in line with up-to-date evidence) across the full plan period 2018-2040. The general approach to new housing is very restricted, in effect limited to infill within settlement boundaries.</p> <p>This severely restricts housing development coming forward, even where development is proportionate to the existing size and scale of the settlement, given the boundaries of many of the defined settlements sit tight to the urban area. Tight settlement boundaries also restrict opportunities for infill development and the ability to deliver smaller housing development sites to meet local need within the immediate/shorter term SP12 needs to provide greater flexibility to accommodate potential increased housing numbers both through the Duty to Cooperate and sites not coming forward in a timely manner. 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. Should neighbourhood plans not be forthcoming there remains significant risk that that growth would be restricted or would require the determination of applications within a policy vacuum. It is recommended that fall-back policy is included within the plan that be enacted should this eventuality occur. Such a policy should specify circumstances whereby development adjacent to settlement limits would be acceptable.</p>	No changes required.	Local Plan 2040 proposes to provide 2665 dwellings to meet unmet needs from the GBBCHMA with 2000 towards the shortfall arising from the Black Country. This is in addition to unmet need provided in the adopted local plan. The 2020 Position Statement identifies that the unmet need arising from the Black Country will emerging from 2027/28. Explanatory text within the plan sets out that the stepped approach is based upon local evidence of delivery and the 2020 Position Statement. Evidence on recent delivery suggests there has been a significant increase, however when compared over the plan period as a whole the average delivery is lower. Considered appropriate to consider delivery over the medium-long term. Local Plan 2040 proposes four strategic allocations and includes a significant number of smaller 'saved' allocations from the current local plan which will continue to deliver significant homes to meet the housing requirement to 2040.
LP2040 551	Ben Cook (Pegasus) on behalf of Richborough Estates	H1	Yes	Yes	No		Yes	<p>Concerned that Policy H1, lacks sufficient flexibility to meet changing housing needs across the district and across the plan period by virtue of its reference to specific percentage figures. It is submitted that the most appropriate approach to housing mix is to continue to be guided by market signals, as defined within the most up-to-date Strategic Housing Market Assessment (SHMA) and Employment Development Needs Assessment (HEDNA).</p> <p>The SHMA and HEDNA should be routinely updated across the plan period which will ensure that housing mix is reflective of market need. Evidence is currently however very high-level and it is not clear from the HEDNA how the housing mix has been established using detailed local evidence in accordance with guidance set out in the National Planning Policy Guidance (NPPG).</p> <p>In seeking to specify a mix, the policy currently 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 identifies that the final housing mix can be considered against four 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.</p>	No changes required.	Local Plan 2040 proposes sufficient land allocations to meet the housing requirement set out within the plan. The selection of allocations has been based upon consideration of the extensive evidence base which supports the Local Plan.
LP2040 552	Ben Cook (Pegasus) on behalf of Richborough Estates	H2	Yes	Yes	No		Yes	<p>It is noted that since the Preferred Options iteration of the plan, policy provisions in relation to affordable housing have been amended to reflect specific affordable housing percentage threshold requirements depending on the nature of development which is supported. This has been based on the findings of the Local Plan and CIL Viability Assessment (September 2020) which identifies the figure of 500 units as an appropriate quantum of development to differentiate between the level of affordable housing required on strategic and non-strategic greenfield sites (paragraph 8.24). However, it is noted that this viability assessment has been based on assumptions and a high-level assessment of the potential viability of these sites. The 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 Strategic Housing Market Assessment (SHMA) and Housing and Employment Needs Assessment (HEDNA).</p> <p>Given the need to deliver much needed affordable housing delivery requirement there should also be provisions made within Policy H2 which allows greater weight in favour of granting planning permission for those developments which meet identified local need and/or deliver levels of affordable housing over and beyond plan policy requirement.</p>	No changes required.	Affordable housing policy within the Local Plan 2040 seeks to achieve the maximum viable level of affordable homes through development. This is supported by the Council's evidence base including viability work.
LP2040 553	Ben Cook (Pegasus) on behalf of Richborough Estates	Chapter 10 Natural Resources	Yes	Yes	No		Yes	<p>The approach to habitats and biodiversity is generally supported where it is consistent with national policy. SP15, Policy NR2 and Policy NR4 continue to include the biodiversity net gain requirement. The supporting text clarifies this will be assessed through Natural England's biodiversity matrix. To ensure consistency with requirements at a national level, policy wording should be amended to include reference to the Biodiversity Metric 3.0 published in July 2021 which significantly updates and improves the earlier metric in line with the biodiversity net gain requirements set out in the Environment Bill.</p>	No changes required.	Support noted.
LP2040 554	Ben Cook (Pegasus) on behalf of Richborough Estates	NR1	Yes	Yes	No		Yes	<p>As currently written the policy could pose restrictions for delivering much needed housing within villages and the wider rural area in line with the Plan's overall Vision and growth strategy, and in particular Strategic Objectives 1 and 2.</p>	No changes required.	Local Plan 2040 sets out where development will be supported within villages in accordance with the Spatial Strategy of the plan.
LP2040 555	Ben Cook (Pegasus) on behalf of Richborough Estates	SP9	Yes	Yes	No		Yes	<p>Policy SP9 is supported in the interests of conserving the natural environment, however it is important that the specific wording of the policy is in accordance with the provisions of national guidance.</p>	No changes required.	Support noted.
LP2040 556	Ben Cook (Pegasus) on behalf of Richborough Estates	SP16	Yes	Yes	No		Yes	<p>Policy SP16 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). In line with previous representations to the Preferred Options consultation it is noted that the policy has been amended to remove reference to the Green Belt which is supported.</p>	No changes required.	Support noted.
LP2040 557	Fiona Lee McQueen (Turley) Vistry Homes Ltd	SHA2	No	No	No	Yes	Yes	<p>Strategic Policy SHA2: Land west of Fazeley, Mile Oak and Bonehill strategic housing allocation is not justified, effective nor is it consistent with the NPPF.</p> <p>Vistry raise the following comments: explanatory evidence does not provide sufficient evidence and exceptional circumstances are not justified. The policy does not clearly set out ways in which the impact of removing land from the Green Belt will be offset through compensatory improvements of the quality of the green belt as required by para 142 of the NPPF. The settlement sustainability study assesses Fazeley, Mile Oak and Bonehill poorly in relation to convenience of amenities and secondary school. it is unclear what facilities and services will be provided. Flood risk not fully considered. There is no evidence in the IDP on the costs, funding and phasing and delivery mechanisms for physical and/or social and community infrastructure required to serve the strategic allocation. The development will perpetuate a spatial plan for Fazeley, Mile Oak and Bonehill that feels disjointed and a lack of cohesion in the community. Full transport modelling is unknown as evidence is incomplete.</p> <p>Vistry outlines potential for a masterplan with 300 new homes in Tamworth which is in a more sustainable setting.</p>	No changes required.	Proposed allocation is supported by a concept statement which alongside the policy details the infrastructure and facilities which will be provided as part of the allocation. Site is selected having regard to evidence base in Green Belt study and because exceptional circumstances exist to meet identified housing need.

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LP2040 558	David Onions (Pegasus Group) Wilson Bowden Developments Ltd.	Whole Plan	Yes	Yes	No	Yes	Yes	<p>The vision statement focuses solely on the provision of housing for the existing residents of Lichfield which does not appear to align with the key issues identified at paragraph 3.3 of the Draft Plan. Although the Vision is broadly supported it should be amended to reflect both present and future housing requirements, including those housing pressures arising through the Duty to Cooperate with neighbouring authorities, with specific reference to meeting the unmet housing needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA).</p> <p>It is important that the plan is consistent and continues to reflect the need to enhance the sustainability of villages with quality housing developments.</p> <p>With regard to the objectives and priorities outline that objectives and priorities may not fulfil the current proposed spatial strategy, particularly with regard to housing and infrastructure.</p> <p>Conflict with objective 1 and the vision statement regarding 'growth in out district will focus on enhancing the sustainability of our villages.'</p>	No changes required.	Comments noted with regards to housing numbers - DTC has been engaged with relevant authorities to ensure clear position of housing provision taken by LDC for the GBBCHMA.
LP2040 559	Stuart Wells (Pegasus) on behalf of Touch Developments	Vision	Yes	Yes	No		Yes	<p>Although the Vision is broadly supported, it should be amended to reflect both present and future housing requirements, including those housing pressures arising through the Duty to Cooperate with neighbouring authorities, with specific reference to meeting the unmet housing needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). The delivery of housing to meet the housing requirements of the GBBCHMA is discussed further in this representation, however it remains the clear position of Touch Developments that this should be included in the Vision to clearly demonstrate commitment to the statutory Duty to Cooperate.</p> <p>It is important that the Local Plan is consistent with the Vision and continues to reflect the need to enhance the sustainability of villages and recognise that the delivery of high quality and much needed housing throughout the District is key to achieving this Vision.</p>	No changes required.	Comments noted with regards to housing numbers - DTC has been engaged with relevant authorities to ensure clear position of housing provision taken by LDC for the GBBCHMA.
LP2040 560	Stuart Wells (Pegasus) on behalf of Touch Developments	SP1	Yes	Yes	No		Yes	<p>The approach of delivering Lichfield District's objectively assessed housing need as a minimum figure in line with the Standard Method is supported. The pro-active approach taken to providing a contribution of dwellings towards the GBBCHMA shortfall is welcomed, along with recognition within the Policy that the Council is working under the Duty to Cooperate to address shortfalls in the wider Housing Market Area. Consistency is required within this Policy, ensuring that the policy approach of a 'minimum' housing figure for both local and HMA housing delivery is reflected throughout the Plan.</p> <p>The approach to reduce the housing delivery contribution towards the wider HMA is therefore not supported, particularly given this approach has not been fully evidenced and justified. It should be considered that there may be scope for the identification of reserve sites should focus on deliverability and include a range of locations to give the housing market flexibility. Given the scale of the issue large sites will need identifying, but it is also considered that smaller scale sites adjacent to existing settlements are likely to be both relatively easy to deliver and also attractive to the market, whilst helping support existing infrastructure and facilities.</p> <p>Clarification is required when referring to the 'remaining larger villages'. Policy SP1 lists all the 'Level 3' settlements as being suitable for new development within their boundaries with the exception of Alrewas. It is not clear why Alrewas is not listed, and this ultimately relates to the above point regarding justification being needed to clearly demonstrate how existing settlements can deliver the housing required within existing settlement boundaries. Support the policy direction that growth will be directed towards sustainable locations broadly in accordance with the above settlement hierarchy and consider it a sounds approach to sustainable distribution of growth.</p>	No changes required.	Comments noted with regards to housing numbers - DTC has been engaged with relevant authorities to ensure clear position of housing provision taken by LDC for the GBBCHMA.
LP2040 561	Stuart Wells (Pegasus) on behalf of Touch Developments	SP2	Yes	Yes	No		Yes	<p>The principle of Policy SP2 is broadly supported, however, further consideration is required in relation to the specific wording of the policy. Clarity is required in relation to "unacceptable air quality levels" as the wording is unclear and ambiguous. The wording here should therefore be clarified, with the intention instead being that new development should not cause air quality standards to be exceeded. Although the overall principle of reducing the reliance on the car is supported in line with national policy, the wording of Policy SP2 is overly onerous and does not allow for any flexibility in line with the District's spatial strategy and the delivery of housing across the District's villages. the policy restricts much needed housing in these settlements coming forward now, where inevitably, as a result of their more rural location will require the use of the car with less regular public transport service provision. Intrinsically Lichfield is a rural district and the general approach in the Local Plan must reflect this. No consideration given to increased proportion of electric vehicle usage.</p>	No changes required.	Support noted. The District Council is to progress supplementary planning guidance in relation to air quality.
LP2040 562	Stuart Wells (Pegasus) on behalf of Touch Developments	SP3	Yes	Yes	No		Yes	<p>The approach to sustainable travel, set out within Policy SP3, 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.</p>	No changes required.	Support noted.
LP2040 563	Stuart Wells (Pegasus) on behalf of Touch Developments	LT1	Yes	Yes	No		Yes	<p>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 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. Parking standards should be imposed through Local Plan policy rather than an SPD to allow for them to be tested at examination</p>	No changes required.	Comments noted. Local Plan 2040 does not set out parking standards. Parking Standards are contained within supplementary planning documents.
LP2040 564	Stuart Wells (Pegasus) on behalf of Touch Developments	SP5	Yes	Yes	No		Yes	<p>The provisions of policy broadly supported, however, it is considered there needs to be additional evidence published in support of the Local Plan Review in order to provide clarity over what additional infrastructure is required to support the Local Plan allocations and how this will be delivered. Although it is recognised that an updated Infrastructure Delivery Plan (IDP) has been prepared since the publication of the Preferred Options Plan, this requires further refinement following consultation with the County Council and other relevant consultees on matters such as highways modelling and education provision. The IDP sets out that Staffordshire County Council are currently updating the Integrated Transport Strategy to consider the emerging Local Plan 2040 and that future updates of the IDP will be required to reflect this evidence once it is completed, however it is important that adequate consultation is undertaken with all the relevant stakeholders where the IDP is to be updated. It is important that an updated IDP is prepared which accurately reflects an up-to-date position with regards to the requirement for new school provision in consultation with the County Council in order that developers are provided with the clarity required to deliver the infrastructure needed to meet with both the District's and County's (as well as other statutory bodies where relevant) requirements as well ensuring that local needs are met. It is imperative that requirements remain consistent across all plan policies in relation to the delivery of infrastructure and provide an accurate and informed evidence base. The delivery of growth and associated infrastructure can only occur if proposals have been properly assessed for viability. Further work is needed on the evidence base particularly in regard to the issue of health and education provision and in relation to viability testing of potential infrastructure.</p>	No changes required.	Infrastructure Funding Statement will be published annually as required by national guidance. The Infrastructure Delivery Plan is a 'living' document which will be updated to take account of the latest information where appropriate. Local Plan 2040 includes policies which seek to ensure appropriate infrastructure is delivered alongside development.
LP2040 565	Stuart Wells (Pegasus) on behalf of Touch Developments	INF2	Yes	Yes	No		Yes	<p>It is important that the delivery of infrastructure is based on up-to date evidence. It is important that the wording of the policy is revisited to include reference to 'up to date evidence base' as well as referring specifically to any identified 'needs of the local community' (which may be reflected through Neighbourhood Plans, for example).</p>	No changes required.	Infrastructure Funding Statement will be published annually as required by national guidance. The Infrastructure Delivery Plan is a 'living' document which will be updated to take account of the latest information where appropriate. Local Plan 2040 includes policies which seek to ensure appropriate infrastructure is delivered alongside development.



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LP2040 566	Stuart Wells (Pegasus) on behalf of Touch Developments	SP7/INF4	Yes	Yes	No		Yes	There is an emphasis within SP7 to meet the need of the local community supported in line with the provisions the importance of development providing green infrastructure, open space and playing pitches where appropriate in line with up-to-date evidence but also through meeting identified local need, whether this is reflected through Neighbourhood Plans or other consultation with the local community/local evidence.	No changes required.	Open Space assessment is updated regularly, the most recent update was published in 2020. Updated playing pitch evidence supports the Local Plan 2040.
LP2040 567	Stuart Wells (Pegasus) on behalf of Touch Developments	INF5	Yes	Yes	No		Yes	Broadly support INF5, it is important that any open space provision requirements are based on an up to date Open Space Assessment, along with any other specifically identified local needs/shortfalls, as set out within Neighbourhood Plans for example, as well as enable the opportunity for an independent Open Space Assessment to be undertaken where there isn't an up to date Open Space Assessment available.	No changes required.	Open Space assessment is updated regularly, the most recent update was published in 2020. Updated playing pitch evidence supports the Local Plan 2040.
LP2040 568	Stuart Wells (Pegasus) on behalf of Touch Developments	SP8	Yes	Yes	No		Yes	The wording of the Policy seems to suggest that a strategic allocation may need to mitigate existing flooding issues in a settlement. This is both unduly onerous and likely to be extremely difficult to resolve, and would not accord with national policy and guidance	No changes required.	Development will be required to take account of flood risk inline with national planning policy.
LP2040 569	Stuart Wells (Pegasus) on behalf of Touch Developments	SP10	Yes	Yes	No		Yes	The approach to sustainable development set out in Policy SP10 is generally supported where it is consistent with national policy. It is considered that reference to protecting the character and distinctiveness of settlements places the potential to restrict future development and plans too great a policy hurdle for development. It would introduce the same level of protection to all settlements as locations which are in Conservation Areas. Noted that the District's Air Quality Action Plan 2019 (AQAP) forms part of the Local Plan evidence base and outlines the action which will be taken in order to improve air quality within the District. One of a list of Area Action Plan Measures, includes the use of the planning regime to minimise impact of new developments on AQMAs, including the preparation of an Air Quality SPG to be completed by the end of 2019. This forms the latest document available in relation to air quality despite the AQAP setting out that an AQAP Steering Group will ensure regular review of the AQA, with the AQAP to be maintained as a "live" strategy. The Proposed Publication appears to make no reference to AQAP which should be reviewed to ensure sufficient evidence and clarity in the measures needed and requirements on landowners/developers in bringing forward larger strategic and other housing developments.	No changes required.	Support noted.
LP2040 570	Stuart Wells (Pegasus) on behalf of Touch Developments	SD1	Yes	Yes	No		Yes	The approach to securing high quality design as set out in Policy SD1 is generally supported however it should be updated to reflect the Government's priorities for well-designed places set out through the National Design Guide and recent updates to the NPPF. Reference instead to enhancing "accessibility and usability" would perhaps be more appropriate in guiding the decision-making process. As set out at paragraph 7.14 of the explanatory text it is important that the policy provides clear expectations for designing high quality development. Previous Preferred Options Plan set a requirement for Masterplans to be prepared alongside strategic developments of over 100 dwellings, which was supported. Policy SD1 however provides less clarity for developers with no explanation of when the preparation of a Masterplan would be considered appropriate. It is important that the policy is able to provide clearer thresholds in relation to the preparation of masterplans and design briefs/design codes.	No changes required.	National Design Guide and National Design Code published after Local Plan 2040 prepared. Not considered a soundness issue.
LP2040 571	Stuart Wells (Pegasus) on behalf of Touch Developments	SP11	Yes	Yes	No		Yes	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 be amended to comply with national policy. When referring to the inappropriate construction of new buildings in the Green Belt and the exceptions to this rule, the policy includes specific reference to the provision of affordable housing on small rural exception sites. This however should be reworded to ensure it is consistent with the provisions of the NPPF. The NPPF (2021) at Paragraph 149 however allows for greater flexibility with regards to the delivery of affordable housing which is not restricted to the provision of affordable housing on rural exception sites, setting out that "limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites)".	No changes required.	Policy in relation to Green Belt is considered to be consistent with national planning policy.
LP2040 572	Stuart Wells (Pegasus) on behalf of Touch Developments	SP12	Yes	Yes	No		Yes	The supporting text confirms that Lichfield District will make provision for 9,727 dwellings between 2018 and 2040, this figure is contested as the contribution towards the GBBCHMA shortfall has not been adequately evidenced and justified. No housing development is planned for Little Aston across the whole plan period, despite it being identified as a 'Level 3' settlement and despite its location in proximity to the West Midlands conurbation in which there is a significant housing shortfall. This highlights the contradictions between the vision of the Local Plan to enhance the District's villages and to meet the needs of the wider HMA and the delivery set out in its policies. Furthermore this shows unbalanced delivery to just a few settlements, with no clear correlation in terms of proportions to the settlement hierarchy Consider that Policy SP12 should be updated, with housing delivery figures reverting back to the approach taken at the Preferred Options stage. Additionally, the general approach to new housing is very restricted, in effect limited to infill within settlement boundaries. This severely restricts housing development coming forward, even where development is proportionate to the existing size and scale of the settlement, given the boundaries of many of the defined settlements sit tight to the existing development area, committed sites and allocations. Furthermore, when reviewing committed sites as set out at Appendix D of the Proposed Publication document, housing delivery across the plan period is heavily reliant on a large number of sites within Lichfield City which were previously allocated under the currently adopted plan raising questions of deliverability, particularly in the short term. 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. It is also a concern that the proposed housing delivery is largely dependent on one single, very large allocation at 'North of Lichfield' (SHA1), given the scale of development there are concerns it will not be sufficiently delivered within the plan period.	Minor modification proposed to text of paragraph 8.6 to correct reference to Table 6 to Table 7. Minor modification to correct this factual error to be proposed.	Contribution was decreased following the publication of the latest GBBCHMA position statement (published 2020) which indicated that BC shortfall emerges from 2027/28 and consideration of the housing trajectory in relation to historic growth levels of the District. Error in paragraph 8.6 noted - suggest factual modification ensure reference to able is correct.
LP2040 573	Stuart Wells (Pegasus) on behalf of Touch Developments	H1	Yes	Yes	No		Yes	Touch Developments are concerned that Policy H1, lacks sufficient flexibility to meet changing housing needs across the District and across the plan period by virtue of its reference to specific percentage figures. It is submitted that the most appropriate approach to housing mix is to continue to be guided by market signals, as defined within the most up-to-date Strategic Housing Market Assessment (SHMA) and Employment Development Needs Assessment (HEDNA). The SHMA and HEDNA should be routinely updated across the plan period which will ensure that housing mix is reflective of market need. 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. The information provided currently does not consider the different housing needs of settlements across the District and is not informed by locally relevant and up to date data. For clarity, supporting primary-source data should be provided which should be clarified and explained further in the document and clearly referenced and explained in the Plan. The policy also sets out minimum net density of 35 dwellings per hectare which is supported. Policy identifies that the final housing mix can be considered against four 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.	Minor modification proposed to text of Policy H2 to correct typographical error in relation to the recommended proportion of Affordable Homes (ownership) where the recommended percentage from the HEDNA evidence has not correctly been transferred to policy. Minor modification to correct this factual error to be proposed.	Changes to be made to figure to correct reference in HEDNA



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LP2040 574	Stuart Wells (Pegasus) on behalf of Touch Developments	H2	Yes	Yes	No		Yes	<p>It is noted that since the Preferred Options iteration of the plan, policy provisions in relation to affordable housing have been amended to reflect specific affordable housing percentage threshold requirements depending on the nature of development which is supported. This has been based on the findings of the Local Plan and CIL Viability Assessment (September 2020) which identifies the figure of 500 units as an appropriate quantum of development to differentiate between the level of affordable housing required on strategic and non-strategic greenfield sites (paragraph 8.24). However, it is noted that this viability assessment has been based on assumptions and a high-level assessment of the potential viability of these sites. The 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 Strategic Housing Market Assessment (SHMA) and Housing and Employment Needs Assessment (HEDNA).</p> <p>Given the need to deliver much needed affordable housing delivery requirement there should also be provisions made within Policy H2 which allows greater weight in favour of granting planning permission for those developments which meet identified local need and/or deliver levels of affordable housing over and beyond plan policy requirement.</p>	No changes required.	Policy H1 is based upon up to date evidence within the HEDNA which details the housing mix required to meet the District's housing need based upon demographics. The policy provides flexibility within each type/size of house to ensure the policy is flexible.
LP2040 575	Stuart Wells (Pegasus) on behalf of Touch Developments	Chapter 10 - Natural Resources	Yes	Yes	No		Yes	The approach to habitats and biodiversity is generally supported where it is consistent with national policy. SP15, Policy NR2 and Policy NR4 continue to include the biodiversity net gain requirement. The supporting text clarifies this will be assessed through Natural England's biodiversity matrix. To ensure consistency with requirements at a national level, policy wording should be amended to include reference to the Biodiversity Metric 3.0 published in July 2021 which significantly updates and improves the earlier metric in line with the biodiversity net gain requirements set out in the Environment Bill.	No changes required.	Support noted.
LP2040 576	Stuart Wells (Pegasus) on behalf of Touch Developments	NR1	Yes	Yes	No		Yes	Consider currently written the policy could pose restrictions for delivering much needed housing within villages and the wider rural area in line with the Plan's overall vision and growth strategy, and in particular Strategic Objectives 1 and 2.	No changes required.	Policy within the Local Plan 2040 provides clear guidance as to when development in rural areas will be supported.
LP2040 577	Stuart Wells (Pegasus) on behalf of Touch Developments	SP9	Yes	Yes	No		Yes	Policy SP9 is supported in the interests of conserving the natural environment, however it is important that the specific wording of the policy is in accordance with the provisions of national guidance.	No changes required.	Support noted.
LP2040 578	Stuart Wells (Pegasus) on behalf of Touch Developments	SP16	Yes	Yes	No		Yes	Policy SP16 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). In line with previous representations to the Preferred Options consultation it is noted that the policy has been amended to remove reference to the Green Belt which is supported.	No changes required.	Support noted.
LP2040 579	Stuart Wells (Pegasus) on behalf of Touch Developments	LA2	Yes	Yes	No		Yes	Policy LA2 does not explain how this housing need will be delivered, particularly in light of the constraints highlighted at Little Aston related to its Conservation Area, Neighbourhood Plan Density Policy and tightly drawn settlement boundary.	No changes required.	Policy within the Local Plan 2040 provides clear guidance as to when development in rural areas will be supported.
LP2040 580	Stuart Wells (Pegasus) on behalf of Touch Developments	Whole document/Sustainability appraisal	Yes	Yes	No		Yes	The SA considers reasonable alternatives sites however there are a number of inconsistencies and errors which have been identified within the SA. Some of these include inaccurate reference to safeguarded land at Burntwood, Lichfield and Fazeley at paragraph 2.4.7 and inaccuracies in relation to the settlement hierarchy including identifying Little Aston as a Smaller Service Village / Smaller Rural Village instead of a Larger Service Village. These should be rectified as part of any further analysis undertaken by Lichfield District Council.	No changes required.	Noted - changes required to SA to correct settlement hierarchy reference
LP2040 581	David Onions (Pegasus Group) Wilson Bowden Developments Ltd.	SP1	Yes	Yes	No	Yes	Yes	<p>It is noted that the HEDNA recommends within the reports key implications that the standard method should be seen as a minimum housing need and that the district council are encouraged to exceed this need with more provisions</p> <p>The contribution of dwellings towards the GBBCHMA has significantly reduced from 4500 to 2665. The reduction has not been fully evidenced and justified. there will be a shortfall in Birmingham and the Black country that needs to be supported.</p> <p>There is a need for SP1 or a new policy drafted to provide a framework to deliver an increased number of dwellings to meet GBBCHMA's current and future housing shortfall. This approach could also build into the local plan a mechanism for dealing with any undersupplying in housing during the plan period or for strategic sites not to deliver housing as predicted in the housing trajectory. There is an element of uncertainty over sub regional support for the approach which is current being pursued.</p> <p>Proposed development is supported in Fradley.</p> <p>When referring to the growth to be directed towards 'larger service villages' greater emphasis however should be placed on the three strategic housing allocations at Fradley, Fazeley and Whittington which should be separately identified above, rather than alongside, the other larger service villages, consistent with the approach taken and emphasis placed upon strategic housing allocation SHA1 at land north-east of Lichfield.</p>	No changes required.	<p>Housing requirement within the Local Plan 2040 provides for the Local Housing Need (LHN) as established by the Standard Methodology and supported by evidence within the HEDNA.</p> <p>Local Plan 2040 proposes to provide 2665 dwellings to meet unmet needs from the GBBCHMA with 2000 towards the shortfall arising from the Black Country. This is in addition to unmet need provided in the adopted local plan. The 2020 Position Statement identifies that the unmet need arising from the Black Country will emerging from 2027/28. Local Plan 2040 proposes four strategic allocations and includes a significant number of smaller 'saved' allocations from the current local plan which will continue to deliver significant homes to meet the housing requirement to 2040. In respect of the 35% uplift to Local Housing Need of cities this applies only to those authorities and guidance states this should not be met outside of the city authorities.</p>
LP2040 582	David Onions (Pegasus Group) Wilson Bowden Developments Ltd.	SHA3	Yes	Yes	No	Yes	Yes	<p>Fradley neighbourhood plan outlines the importance of identifying the necessary infrastructure to support continued growth.</p> <p>More housing can be allocated to SHA3. Opportunity to increase the allocation at Fradley beyond that specified currently in Policy SP12. Initial estimates based on using the 35 dwelling per hectare density minimum, the proposals being pursued by the Leavesley Group and Grasscroft and the potential to increase marginally the size of the residential components shown on the masterplan for land north of Hay End Lane gives the overall allocation a more realistic capacity of 750 units.</p> <p>Reference to secondary level school provision within Policy SHA3 however is not consistent with details set out in the site's Concept Statement or the Infrastructure Delivery Plan. As highlighted previously, Policy SHA3 requires amending to ensure it remains consistent with other provisions in the plan and supporting evidence within the Infrastructure Delivery Plan, it should be amended to read 'provision for education infrastructure, including a primary school on site'.</p>	No changes required.	Housing figures associated with allocation based upon evidence. Concept statement which supports allocation includes detail in regards to infrastructure requirements.
LP2040 583	David Onions (Pegasus Group) Wilson Bowden Developments Ltd.	SP2	Yes	Yes	No	Yes	Yes	<p>The principle of SP2 is broadly supported however further considerations is required in relation to specific wording of the policy and supporting explanatory text.</p> <p>Specific reference should be made within Policy SP2's supporting explanatory text to the evidence set out within the IDP and the benefits for sustainable transport provision in relation to the strategic housing allocation at Fradley.</p> <p>Further clarity is required in relation to 'unacceptable air quality levels' as the wording is not clear with too much ambiguity. The wording here should therefore be clarified, with the intention instead being that new development should not cause air quality standards to be exceeded.</p>	No changes required.	Support noted.
LP2040 584	David Onions (Pegasus Group) Wilson Bowden Developments Ltd.	LT1	Yes	Yes	No	Yes	Yes	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 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.	No changes required.	Comments noted. Local Plan 2040 does not set out parking standards. Parking Standards are contained within supplementary planning documents.

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LP2040 585	David Onions (Pegasus Group) Wilson Bowden Developments Ltd.	SP5	Yes	Yes	No	Yes	Yes	There needs to be additional evidence published in support of the Local Plan. There needs to be further refinement following consultation with the County Council and other relevant consultees on matters such as highways modelling and education provision.  In relation to education infrastructure for example, and in particular with regards to the Fradley Strategic Housing Allocation, it is important that an updated IDP is prepared which accurately reflects an up-to-date position with regards to the requirement for new school provision in consultation with the County Council in order that developers are provided with the clarity required to deliver the infrastructure needed to meet with both the District's and County's (as well as other statutory bodies where relevant) requirements as well ensuring that local needs are met. It is imperative that requirements remain consistent across all plan policies in relation to the delivery of infrastructure and provide an accurate and informed evidence base.	No changes required.	Infrastructure Funding Statement will be published annually as required by national guidance. The Infrastructure Delivery Plan is a 'living' document which will be updated to take account of the latest information where appropriate. Local Plan 2040 includes policies which seek to ensure appropriate infrastructure is delivered alongside development.
LP2040 586	David Onions (Pegasus Group) Wilson Bowden Developments Ltd.	SP6	Yes	Yes	No	Yes	Yes	There needs to be additional evidence published in support of the Local Plan. There needs to be further refinement following consultation with the County Council and other relevant consultees on matters such as highways modelling and education provision.  In relation to education infrastructure for example, and in particular with regards to the Fradley Strategic Housing Allocation, it is important that an updated IDP is prepared which accurately reflects an up-to-date position with regards to the requirement for new school provision in consultation with the County Council in order that developers are provided with the clarity required to deliver the infrastructure needed to meet with both the District's and County's (as well as other statutory bodies where relevant) requirements as well ensuring that local needs are met. It is imperative that requirements remain consistent across all plan policies in relation to the delivery of infrastructure and provide an accurate and informed evidence base.	No changes required.	Infrastructure Funding Statement will be published annually as required by national guidance. The Infrastructure Delivery Plan is a 'living' document which will be updated to take account of the latest information where appropriate. Local Plan 2040 includes policies which seek to ensure appropriate infrastructure is delivered alongside development.
LP2040 587	David Onions (Pegasus Group) Wilson Bowden Developments Ltd.	INF1	Yes	Yes	No	Yes	Yes	Wilson Bowden Developments agrees that developer contributions have a significant role to play in infrastructure delivery through CIL and S106 agreements and that Land north of Hay End Lane, alongside the wider Strategic Housing Allocation at Fradley has the ability to deliver the infrastructure requirements set out in the Local Plan which will contribute positively towards achieving the Vision for Fradley and the wider district.  local junctions in the vicinity of the development at Hay end lane can easily accommodate additional vehicles associated with the development whilst the increase in trips as a result of the development would not result in the need for upgrades to these junctions. It is important that further clarity is provided in relation to any strategic highways improvement schemes to provide developers with a level of certainty and to ensure a joint and coordinated approach to any required infrastructure delivery.  The supporting policy text provides no further explanation regarding the 'Concept Statements'. Although the Concept Statements can be found at Appendix B of the Local Plan, this should be explicitly set out within the policy to avoid any ambiguity.	No changes required.	Support noted. Further transport evidence is in the process of being undertaken following delay caused by the Coronavirus pandemic.
LP2040 588	David Onions (Pegasus Group) Wilson Bowden Developments Ltd.	INF2	Yes	Yes	No	Yes	Yes	It is important that the wording of the policy is revisited to include reference to 'up to date evidence base' as well as referring specifically to any identified 'needs of the local community'	No changes required.	Local Plan 2040 is supported by an up to date evidence base. Not considered necessary to directly refer to this in the specific policy.
LP2040 589	David Onions (Pegasus Group) Wilson Bowden Developments Ltd.	INF 5	Yes	Yes	No	Yes	Yes	Support is broadly given to Local Policy INF5 however it is important that any open space provision requirements are based on an up to date Open Space Assessment, along with any other specifically identified local needs/shortfalls, as set out within Neighbourhood Plans for example, as well as the opportunity for an independent Open Space Assessment to be undertaken where there isn't an up to date Open Space Assessment available. The Policy should therefore be amended to refer to 'an up-to-date Open Space Assessment and/or provision in line with identified local community needs' rather than having regard to 'the most up to date Open Space Assessment'	No changes required.	Open Space assessment is updated regularly, the most recent update was published in 2020. Updated playing pitch evidence supports the Local Plan 2040.
LP2040 590	David Onions (Pegasus Group) Wilson Bowden Developments Ltd.	SP8	Yes	Yes	No	Yes	Yes	May need to mitigate existing flooding issues in a settlement. This is both unduly onerous and likely to be extremely difficult to resolve.	No changes required.	Development will be required to take account of flood risk inline with national planning policy.
LP2040 591	David Onions (Pegasus Group) Wilson Bowden Developments Ltd.	SP10	Yes	Yes	No	Yes	Yes	It is considered that reference to protecting the character and distinctiveness of settlements, places the potential to restrict future development and places too great a policy hurdle for development. It would introduce The same level of protection to all settlements as placed on Conservation Areas. The policy should be revised to refer to respecting and reinforcing character and distinctiveness in line with national policy. Encouraging the reuse of previously developed land/re use of buildings is currently amalgamated with the conservation of heritage assets and this should be set out as two separate points to be addressed where relevant.  The policy sets out that development should "sustain and improve air quality with no decline in standards being deemed acceptable". The wording here should be clarified with reference to the relevant air quality standards which should not be exceeded.  The Proposed Publication document appears to make no reference to the AQAP which should be reviewed in order to ensure sufficient evidence base and clarity in the measures needed and requirements on landowners/developers in bringing forward larger strategic and other housing developments.	No changes required.	Policy considered to be consistent with national policy and seeks to provide consideration of character and distinctiveness of all settlements.
LP2040 592	David Onions (Pegasus Group) Wilson Bowden Developments Ltd.	SD1	Yes	Yes	No	Yes	Yes	SD1 should be updated to reflect the Government's priorities for well-designed places set out through the National Design Guide and recent updates to the NPPF.  With regards to amenity and open space the statement 'new development should enhance comfort, convenience and enjoyment' is open to interpretation and requires greater clarity in terms of expectations on developers and residents. Reference instead to enhancing 'accessibility and usability' would perhaps be more appropriate in guiding the decision-making process.  Policy SD1 has been amended to require masterplans and design briefs 'should the local planning authority consider that they are required to accompany proposals'. The previous Preferred Options Plan set a requirement for Masterplans to be prepared alongside strategic developments of over 100 dwellings, which was supported. Policy SD1 however provides less clarity for developers with no explanation of when the preparation of a Masterplan would be considered appropriate.  Policy SD1 should be amended to refer to those sites where masterplans are required.	No changes required.	National Design Guide and National Design Code published after Local Plan 2040 prepared. Not considered a soundness issue.
LP2040 593	David Onions (Pegasus Group) Wilson Bowden Developments Ltd.	SP11	Yes	Yes	No	Yes	Yes	The development management matters are addressed by reference to national Green Belt policy however the wording should be amended to comply with national policy. It is suggested the reference to Green Belt changes adjacent to Fazeley and Whittington is removed as this is set out through Strategic Policy 1	No changes required.	Policy is considered to be consistent with national planning policy.

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LP2040 594	David Onions (Pegasus Group) Wilson Bowden Developments Ltd.	SP12	Yes	Yes	No	Yes	Yes	<p>It is noted that the explanatory text at paragraph 8.6 refers to Table 6 rather than Table 7 as per the table labelled at page 77 of the document which should be amended. Similarly to Policy SP1 (Spatial Strategy), there is no clear justification set out within the supporting explanatory text for the significant drop in dwelling numbers since the previous iteration of the plan. The latest consultation document only includes provision for a contribution towards the wider HMA from 2027/28. Similarly to Policy SP1 (Spatial Strategy), there is no clear justification set out within the supporting explanatory text for the significant drop in dwelling numbers since the previous iteration of the plan.</p> <p>The proposed strategy is heavily reliant on a single large site to the northeast of Lichfield, proposing 3,300 new dwellings to the district's housing delivery requirement. There is limited evidence however to demonstrate the ability of this site to deliver the required number of homes during the plan period. Any delays in the delivery of this allocation would result in housing supply issues. The figures taken from position statement 020 are out of date having been taken from 2019 SHLAAs with the requirement for housing delivery across the HMA having increased significantly.</p> <p>The housing trajectory at Appendix A to the Local Plan presents a graphical representation of the proposed housing trajectory, there is no site-by-site matrix published to support the overall trajectory identified, nor the 'stepped' or 'deferred' delivery of the housing requirement which will require further clarity within the Plan. SP12 needs to be updated with up to date housing figures and preferred options.</p> <p>Given the significant shortfall of affordable housing delivery identified across the district there should also be provisions made which allows greater weight in favour of granting planning permission for developments which meet identified local need and/or deliver levels of affordable housing over and beyond plan policy requirements. The policy should be amended to ensure it is consistent with the provisions of other draft policies within the plan including SP1 and H2.</p>	Minor modification proposed to text of paragraph 8.6 to correct reference to Table 6 to Table 7. Minor modification to correct this factual error to be proposed.	Propose modification to correct reference to Table 7. Trajectory at Appendix A takes a cautious approach in respect of delivery of dwellings from SHA1. Trajectory is supported by evidence within the Five Year Housing Land Supply and Strategic Housing Land Availability Assessment. National planning policy requires a detail trajectory for the first five years, as set out within the evidence base.
LP2040 595	David Onions (Pegasus Group) Wilson Bowden Developments Ltd.	H1	Yes	Yes	No	Yes	Yes	<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 within the most up-to-date Strategic Housing Market Assessment (SHMA) and Employment Development Needs Assessment (HEDNA).</p> <p>The mix set out for Affordable Homes (ownership) does not appear to be consistent with the recommendations contained within the latest HEDNA however this may be a typographical error where the mix for Tamworth has been included instead of that for Lichfield as the HEDNA covers both local authority areas. This should be reviewed and reflected accurately within the supporting policy.</p> <p>Policy H1 should include some recognition of these settlement and site-specific considerations to ensure that a rigidly applied policy would not ultimately deliver a disproportionate number of smaller scale homes, which went against both the characteristics of Fradley and the likely market demand.</p>	Minor modification proposed to text of Policy H2 to correct typographical error in relation to the recommended proportion of Affordable Homes (ownership) where the recommended percentage from the HEDNA evidence has not correctly been transferred to policy. Minor modification to correct this factual error to be proposed.	Policy H1 is based upon up to date evidence within the HEDNA which details the housing mix required to meet the District's housing need based upon demographics. The policy provides flexibility within each type/size of house to ensure the policy is flexible.
LP2040 596	David Onions (Pegasus Group) Wilson Bowden Developments Ltd.	H2	Yes	Yes	No	Yes	Yes	The 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 Strategic Housing Market Assessment (SHMA) and Housing and Employment Needs Assessment (HEDNA).	No changes required.	Policy H1 is based upon up to date evidence within the HEDNA which details the housing mix required to meet the District's housing need based upon demographics. The policy provides flexibility within each type/size of house to ensure the policy is flexible.
LP2040 597	David Onions (Pegasus Group) Wilson Bowden Developments Ltd.	Chapter 10 Natural Resources	Yes	Yes	No	Yes	Yes	To ensure consistency with requirements at a national level, policy wording should be amended to include reference to the Biodiversity Metric 3.0 published in July 2021 which significantly updates and improves earlier metric in line with the biodiversity net gain requirements set out in the Environment Bill.	No changes required.	Requirements are set out at national level which can change and should be read in conjunction within he Local Plan 2040.
LP2040 598	David Onions (Pegasus Group) Wilson Bowden Developments Ltd.	NR1	Yes	Yes	No	Yes	Yes	The policy currently reads that "new building development in the countryside away from existing settlements or outside of those areas designated for development within this local plan, will be strictly controlled". The use of the word 'away' within this statement is unclear and the policy should be refined to ensure development adjacent to existing settlements is not restricted by the wording of this policy.	No changes required.	Policy within Local Plan 2040 provides clear guidance as to where development in rural areas will be supported.
LP2040 599	David Onions (Pegasus Group) Wilson Bowden Developments Ltd.	SP9	Yes	Yes	No	Yes	Yes	As currently written the policy sets out that 'Development will be permitted where proposals do not have a negative impact on water quality'. For greater clarity however it is suggested that this should be amended in line with the wording of Paragraph 174 (f) of the NPPF (2021) i.e. 'development should not have an unacceptable impact on water quality'.	No changes required.	NPPF 2021 published after publication of Local Plan 2040 for consultation. Any changes required to accord with revised NPPF to be considered through examination.
LP2040 600	David Onions (Pegasus Group) Wilson Bowden Developments Ltd.	SP16	Yes	Yes	No	Yes	Yes	In line with previous representations to the Preferred Options consultation it is noted that the policy has been amended to remove reference to the Green Belt which is supported	No changes required.	Support noted.
LP2040 601	David Onions (Pegasus Group) Wilson Bowden Developments Ltd.	FR1	Yes	Yes	No	Yes	Yes	In such circumstances, there may be opportunities for the western growth of the settlement, as identified in this Plan, to be further extended utilising the same infrastructure, with future housing growth to the northern side of the settlement enabling the sustainable growth of Fradley	No changes required.	Support noted.
LP2040 602	David Onions (Pegasus Group) Wilson Bowden Developments Ltd.	FR2	Yes	Yes	No	Yes	Yes	It would be helpful to clarify within the policies supporting text regarding the delivery of a medical centre/pharmacy. 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 (and in the case of the medical facilities the CCG). This should be made explicit within the requirements of this Policy.	No changes required.	Infrastructure Funding Statement will be published annually as required by national guidance. The Infrastructure Delivery Plan is a 'living' document which will be updated to take account of the latest information where appropriate. Local Plan 2040 includes policies which seek to ensure appropriate infrastructure is delivered alongside development.

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LP2040 603	David Onions (Pegasus Group) Wilson Bowden Developments Ltd.	Sustainability Appraisal	Yes	Yes	No	Yes	Yes	<p>Section 3.1 sets out the context and objectives which have informed the Plan and the SA. It would be helpful if this could 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 60 NPPF 2021). This is key consideration in the drafting of the Plan and the accompanying SA and should be included.</p> <p>Overall, this document needs to provide further narrative to explain how the spatial strategy and associated allocations were selected over other reasonable alternatives.</p> <p>It is set out at Section 2.4 that the spatial strategy reflects a combination of Residential Growth Options 3 to 5 but there is no clear narrative explaining how the selections were made and how this represents a balanced, sustainable strategy. It would be helpful if an explanation of how the 2,665 dwellings contribution (which sits between Growth Option 3 and 4) towards the GBBCHMA shortfall has been determined and also why there has been a reduction in the dwelling contribution from 4,500 (in line with the Residential Growth Option 5) as previously proposed through the previous Preferred Options document.</p>	No changes required.	<p>Housing requirement within the Local Plan 2040 provides for the Local Housing Need (LHN) as established by the Standard Methodology and supported by evidence within the HEDNA.</p> <p>Local Plan 2040 proposes to provide 2665 dwellings to meet unmet needs from the GBBCHMA with 2000 towards the shortfall arising from the Black Country. This is in addition to unmet need provided in the adopted local plan. The 2020 Position Statement identifies that the unmet need arising from the Black Country will emerging from 2027/28. Local Plan 2040 proposes four strategic allocations and includes a significant number of smaller 'saved' allocations from the current local plan which will continue to deliver significant homes to meet the housing requirement to 2040. In respect of the 35% uplift to Local Housing Need of cities this applies only to those authorities and guidance states this should not be met outside of the city authorities.</p>
LP2040 604	Jessica Graham Barratt WM	NR2	N/A	N/A	No	No	Yes	<p>Policy NR2 - development will be permitted where it delivers biodiversity net gain. No specific net gain requirement listed within the policy or supporting text. Further clarity is required on whether net gain will be requested in accordance with national requirements or if LDC will continue to pursue a 20% net gain requirement as required within the adopted Biodiversity and Development Supplementary Planning Document (2016). The Local Plan and CIL Viability Assessment (September 2020) has not assessed the potential implications of 20% net gain on viability. Currently the viability assessment has made an allowance for 15% public open space on site and not for any additional land that may be required for on-site biodiversity improvements or biodiversity offsetting.</p>	No changes required.	<p>Supplementary planning guidance sets out the requirement.</p>
LP2040 605	Jessica Graham Barratt WM	SP1	No	N/A	No	Yes	No	<p>It is not considered that the plan is currently positively prepared. This is because LDC has based its HMA contribution on PS3, which has neither assessed the current housing position based on the standard method needs, nor assessed the housing shortfall beyond 2031, nor been independently examined. Consider there is significantly more than a 2,597 dwelling shortfall remaining up to 2031 which should be confirmed and accommodated within the HMA local plan reviews. Table 4 sets out that Burntwood is considered to be a Level 2 'other main centre' settlement within the hierarchy. Only 4% of the District's housing growth is being directed to Burntwood in comparison to 55% to Lichfield City, 6% to Rugeley, 8% to Tamworth and 29% to larger service villages. Consider that LDC is not directing growth in accordance with its settlement hierarchy, resulting in more growth being directed to settlements that are less sustainable than Burntwood. The plan has therefore not been positively prepared.</p> <p>Paragraph 4.32 states that Burntwood is a significant town but does not have many of the local services that a town of its size would normally have. The specific facilities that LDC considers that Burntwood does not have are not noted in the plan. The plan is supported by a 'Settlement Sustainability Study' (September 2020). This study has identified that Burntwood is the second highest scoring settlement after Lichfield city (Table 4.1) and "Burntwood as a Level 2 settlement... is viewed as more sustainable than those in lower levels" (paragraph 5.1). Appendix B of this study also sets out the wide range of shops, services, facilities and employment opportunities which are currently available in Burntwood. We therefore do not consider that the statement made in paragraph 4.32 is supported by LDC's own evidence base, which has assessed Burntwood as a sustainable settlement with a range of services. Additionally, Burntwood provides more services and facilities than the settlements which are currently proposed to deliver more housing growth in this plan period (Fazeley, Mile Oak &amp; Bonehill and Fradley) and the Spatial Strategy is therefore not appropriate. Consider that the proposed contribution to the HMA housing shortfall is not based on robust evidence and the plan does not propose to tackle the housing shortfall post 2031 and is therefore deferring meeting the HMA needs to the next plan period, which is not considered to be effective. The plan is not proposing a sufficient level of housing to meet local or HMA needs and is not directing housing growth in accordance with the spatial strategy because settlements less sustainable than Burntwood are expected to deliver more housing. The evidence used to support HMA Position Statement 4 should be made publicly available for scrutiny. Once published, the HMA authorities should agree how the shortfall will be distributed across the HMA so that the local plan reviews that are currently being prepared will be based on the most recent information on housing need. LDC should direct more housing growth to Burntwood, which is the second most sustainable settlement in the District. In order to comply with both the settlement hierarchy and its evidence base and to ensure that the plan is positively prepared. LDC has already identified that there are exceptional circumstances to release Green Belt land elsewhere in the District and it is therefore considered that sites should be released from the Green Belt and allocated adjacent to Burntwood (see our separate response to Strategic Policy 11). Barratt West Midlands' (Barratt) land to the east of Rugeley Road, Burntwood (SHLAA Site 130) has been previously assessed by LDC as being a suitable location for growth because it was located within a proposed Area of Development Restraint (Preferred Options and Submission Cabinet version) prior to its subsequent removal from</p>	No changes required.	<p>Housing requirement within the Local Plan 2040 provides for the Local Housing Need (LHN) as established by the Standard Methodology and supported by evidence within the HEDNA.</p> <p>Local Plan 2040 proposes to provide 2665 dwellings to meet unmet needs from the GBBCHMA with 2000 towards the shortfall arising from the Black Country. This is in addition to unmet need provided in the adopted local plan. The 2020 Position Statement identifies that the unmet need arising from the Black Country will emerging from 2027/28. Local Plan 2040 proposes four strategic allocations and includes a significant number of smaller 'saved' allocations from the current local plan which will continue to deliver significant homes to meet the housing requirement to 2040. In respect of the 35% uplift to Local Housing Need of cities this applies only to those authorities and guidance states this should not be met outside of the city authorities.</p>
LP2040 606	Jessica Graham Barratt WM	SP11	Yes	Yes	No	Yes	Yes	<p>Lichfield District Council ('LDC') has produced an updated Green Belt Review (2021) to assist it with its site selection work which has assessed sites being promoted adjacent to settlements which recommended that all of the moderately performing parcels around Burntwood (including Barratt West Midlands' ('Barratt') site SHLAA reference 130) should be taken forward for further consideration and are not likely to harm the Green Belt. LDC needs to consider in the context of the wider plan constraints and development needs. The Submission plan LDC has proposed to release two parcels of land from the Green Belt and allocate them for residential development adjacent to Fazeley, Mile Oak &amp; Bonehill and Whittington. Therefore LDC considers that there are exceptional circumstances to release sites from the Green Belt to meet its development needs (paragraph 7.32 of the Submission plan). It is considered that LDC needs to plan for more housing then it is currently planning for to meet local and Housing Market Area (HMA) needs. As already established there are exceptional circumstances to release sites from the Green Belt to meet its development needs. For the plan to be sound, additional sites should be identified for development. We consider that additional housing growth should be directed, in accordance with the settlement hierarchy, to the second most sustainable settlement in the District (Burntwood).</p> <p>We do not agree that Barratt's site is higher performing against this purpose than other sites adjacent to Burntwood. Do not support the findings of the 2021 Green Belt Review and consider that Barratt's site does not perform well against the purposes of the Green Belt. The site has consistently been identified as being within a moderately performing Green Belt parcel, will provide community benefits and considered for release from the Green Belt and allocation for development. This approach is not considered to be effective as should deal with cross boundary strategic matters - the proposed contribution to the HMA housing shortfall is not based on robust evidence and it does not propose to tackle the housing shortfall. The consultation version of Submission Plan (July 2021) has now removed the proposed ADRs. LDC has provided no justification as to why the ADRs were removed between the Committee version of the Submission plan in February 2021. We do not consider that the level of housing proposed to meet the District or HMA's housing needs is sound and additional housing is required in order to meet housing needs. LDC has determined that Green Belt release is already required to meet current housing needs (which is significantly lower than it should be), expected that additional Green Belt release will be required to meet the development needs of the District beyond the plan period and also considered likely that additional Green Belt release will also be required within the plan period.</p> <p>LDC is not proposing to safeguard any land between the urban areas and the Green Belt in order to meet such longer term development needs stretching 'well beyond the plan period' so do not consider that the plan accords with the requirements of NPPF paragraph 143. The Fazeley, Mile Oak &amp; Bonehill proposed allocation site was assessed as having 'limited harm' to the Green Belt in the 2021 review and it is a Level 3 settlement in the settlement hierarchy Barratt's site was assessed as 'not likely to harm' the Green Belt and it is adjacent to a Level 2 settlement - do not consider that the plan is directing growth in accordance with the settlement hierarchy or LDC's own evidence base.</p> <p>Consider that there is evidenced justification for Barratt's site to be released from the Green Belt and allocated for residential development. We</p>	No changes required.	<p>Site is selected having regard to evidence base in Green Belt study and because exceptional circumstances exist to meet identified housing need. Safeguarded land is not considered to be required within the Local Plan 2040, particularly given Governments stated intent to introduce new planning system.</p>



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LP2040 607	Jessica Graham Barratt WM	SP12	No	N/A	No	Yes	Yes	<p>It is not considered that LDC is currently meeting the Duty to Cooperate on the basis that there is an insufficient amount of published evidence justifying the current HMA shortfall position; there is no agreement on the distribution on the shortfall; and LDC is not able to demonstrate that it is proposing a sufficient contribution towards meeting the shortfall.</p> <p>It is not considered that the plan is currently positively prepared because LDC has based its HMA contribution on PS3 which has neither assessed the current housing position based on the standard method needs nor assessed the housing shortfall beyond 2031, nor been independently examined. Consider that there is significantly more than a 2,597 dwelling shortfall remaining up to 2031 which should be confirmed and accommodated within the HMA local plan reviews.</p> <p>LDC's approach to meeting its own need is also not considered to be sound. LDC has stated that based on the standard method its housing need is 321 dwellings per annum over the plan period. LDC has not proposed to increase its housing need on the basis that its Housing and Economic Development Need Assessment (HEDNA) (September 2019 and updated November 2020) concluded that no uplift beyond the standard method is needed from an economic perspective. Section 3 of Turley's District Needs Report sets out key failures of the HEDNA, primarily in regard to its failure to consider previous assessments of housing need which clearly demonstrate that Lichfield District has a recent history of delivering significantly more dwellings than the standard method (624 dwellings per annum on average over the last 3 years). LDC's adopted Core Strategy evidence base demonstrated that the District's housing need was between 410-450 dwellings per annum. LDC's approach to limiting the District's housing need to 321 dwellings per annum is not supported or considered sound. There is no evidence as to why LDC should be planning for growth of less than 410-450 dwellings per annum, as currently adopted. There could be an argument to justify boosting the supply over 500 dwellings per annum as demonstrated by recent delivery rates. Additionally considers that the HMA shortfall is significantly greater than the 2,597 dwellings figure quoted in the HMA Housing Position Statement (2020). Once the Position Statement has been updated to reflect the revisions made by the standard method, we consider that LDC will be required to accommodate additional dwellings to meet the HMA need and which should be in addition to the 410+ dwellings being planned for to meet the District's own needs.</p> <p>The housing need figure for the District has been based on the HEDNA's findings. We do not support this position The housing requirement for the District is therefore not consider to be an appropriate strategy.</p> <p>The proposed contribution to the HMA housing shortfall is not based on robust evidence and it does not propose to tackle the housing shortfall post 2031, thereby deferring it to the next plan period. This approach is not considered to be effective.</p> <p>The plan is not proposing a sufficient level of housing to meet local or HMA needs and is not directing housing growth in accordance with the spatial strategy because settlements that are less sustainable than Burntwood are expected to deliver more housing.</p> <p>Consider that LDC should reassess its proposed housing need and increase the District need to reflect the current adopted housing need, past</p>	No changes required.	<p>Housing requirement within the Local Plan 2040 provides for the Local Housing Need (LHN) as established by the Standard Methodology and supported by evidence within the HEDNA.</p> <p>Local Plan 2040 proposes to provide 2665 dwellings to meet unmet needs from the GBBCHMA with 2000 towards the shortfall arising from the Black Country. This is in addition to unmet need provided in the adopted local plan. The 2020 Position Statement identifies that the unmet need arising from the Black Country will emerging from 2027/28. Local Plan 2040 proposes four strategic allocations and includes a significant number of smaller 'saved' allocations from the current local plan which will continue to deliver significant homes to meet the housing requirement to 2040. In respect of the 35% uplift to Local Housing Need of cities this applies only to those authorities and guidance states this should not be met outside of the city authorities.</p>
LP2040 608	Jessica Graham Barratt WM	H1	N/A	N/A	No	Yes	Yes	<p>Consider that in order to be an appropriate strategy, Policy H1 should refer to market considerations and needs assessments produced by applicants as a key factor that will be considered when determining housing mix for a site. Additionally, request that when determining housing mix for a site, consideration is given to the size of properties (sqft or sqm) proposed rather than just bedroom numbers. The table within Policy H1 currently states that sites should seek to deliver circa '44-45%' 3 bedroom market dwellings. It is unclear if this is a mistake or if LDC propose to differ from the Housing and Economic Development Needs Assessment's (HEDNA) mix. We consider that this should be amended to accord with the proposed mix in the HEDNA of 45-55%, subject to the caveats identified above.</p> <p>Policy H1 proposes to implement a blanket minimum net density of 35 dwellings per hectare on new housing sites across the District except in Lichfield City and Burntwood where densities of 50 dwellings per hectare should be achieved. It is considered that Policy H1 should be amended to reflect the exceptions listed in the NPPF.</p> <p>Requests amending the bullet points within Policy H1 to state that market signals will be taken into consideration when determining housing mix for a site. Consideration to the use of house sizes over number of bedrooms to ensure that housebuilders delivering smaller products are not penalised unfairly. Amend the table within Policy H1 to state 45-55% for 3 bedroom market dwellings, to accord with the HEDNA. Amend references to minimum density requirements to reflect the criteria and exceptions listed under paragraph 124 and 125 of the NPPF.</p>	No changes required.	<p>Policy H1 is based upon up to date evidence within the HEDNA which details the housing mix required to meet the District's housing need based upon demographics. The policy provides flexibility within each type/size of house to ensure the policy is flexible.</p>
LP2040 609	Jessica Graham Barratt WM	H2	N/A	N/A	No	Yes	Yes	<p>Support LDC proposing a measurable and quantifiable affordable housing requirement within the Submission version of the plan. Have reviewed LDC's Local Plan and CIL Viability Assessment (September 2020), note that the Assessment has assessed the viability of delivering different affordable housing requirements against the other policy requirements of the plan, and the impact of CIL charging. The Assessment has not considered potential S106 contributions in addition to CIL monies. At plan-making stage, the consideration of viability is a "snapshot in time" and it is difficult to confirm the level of potential additional S106 contributions or predict changes in legislation, regulation or market performance during the plan period. The Assessment (para 2.1.9) recognises that it appears likely that there will still be a role for planning application stage / site specific viability reviews where particular circumstances justify such an approach. Therefore in order for the policy to be robust and to ensure sites are deliverable, "subject to viability" should be inserted into Policy H2, 'additional information' column of the table for rows 1 and 2 (non-allocated PDL and greenfield sites) – "subject to viability".</p>	No changes required.	<p>Support noted. Local Plan 2040 is supported by viability evidence which has informed the policies within the plan.</p>
LP2040 610	Kezia Taylerson (Historic England)	Sustainability Appraisal	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	<p>Historic England notes that there are a number of references to the level of harm within the SEA for the historic environment, heritage assets and their settings. Page 43, paragraph 5.4.8 accepts that the development strategy will have a negative impact for the historic environment, but asserts that the direction of the policy/strategy will reduce the harm to 'an acceptable minimum' and as a result there will be a 'neutral effect for the historic environment'. We do not agree that this is the case. We consider that the strategy is inadequate to reduce the harm to heritage through the approach of four strategic allocations and a strategy to increase the plan period housing requirement to 13,306 dwellings. We consider that the term an 'acceptable minimum' is an unsound approach and does not conform with the NPPF requirement for Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment and we do not agree, that taking this all into account there is a neutral effect for the historic environment. Instead, in its current form we consider that there is harm for the significance of the historic environment, heritage assets including their setting and that this can be avoided and/ or mitigated with appropriate amendments to the Local Plan.</p> <p>The section under paragraph 5.5.18 details the SEA response to the Built and Historic Environment Chapter and cites 'no significant negative effects' and yet we would expect this to have a positive effect for the historic environment, if the policy wording and application of the policy were considered fully. We have made representation to this section of the Local Plan in detail and will look forward to working with the Council.</p> <p>We disagree with paragraph 5.6.3 and consider that there will be cumulative effects for development in the North of Lichfield area as a result of existing housing allocations and the proposed SHA 1 North of Lichfield Housing Allocation site.</p> <p>We would welcome involvement in the monitoring objectives cited in paragraph 7.1.3 of this report.</p>	No changes required.	<p>Local Plan has been supported by Sustainability Appraisal at all stages of the plan making process.</p>
LP2040 611	Peter Fawcett - Gladman	Sustainability Appraisal	N/A	N/A	No	No	N/S	<p>The Sustainability Appraisal fails to provide adequate consideration of reasonable alternatives to the preferred spatial option. Greater consideration should have been given to the assessment of sustainable locations for residential development outside of the Green Belt should have been assessed in greater detail in light of their capacity to accommodate sustainable growth beyond existing commitments over the emerging plan period.</p>	No changes required.	<p>Local Plan has been supported by Sustainability Appraisal at all stages of the plan making process.</p>
LP2040 612	Peter Fawcett - Gladman	Chapter 3 - Themes, issues, vision and objectives	N/A	N/A	No	No	N/S	<p>Broadly supports the approach of the strategic objectives and priorities which seek to direct development to the most sustainable locations in the district. However, consider that the district's vision, objectives and priorities require further refinement. In particular, we would highlight the need to consider sustainable locations within neighbouring authorities which closely relate to Lichfield district, namely land within Lichfield district to the north of Tamworth and the opportunity to bring forward sustainable forms of development. It should therefore be considered central to the strategic objectives and priorities of the plan as a location that can sustainably accommodate further growth in a location outside of the Green Belt.</p>	No changes required.	<p>Support noted.</p>
LP2040 613	Peter Fawcett - Gladman	SP1 - The Spatial Strategy	N/A	N/A	No	No	N/S	<p>The settlement hierarchy and spatial strategy fail to recognise the holistic role of neighbouring towns and settlements in the consideration of the sustainability of adjacent areas that fall within Lichfield district. The proposed spatial approach is inconsistent with paragraph 142 of the NPPF, in that it fails to consider the consequences for sustainable development of channelling development towards locations within the Green Belt.</p>	No changes required.	<p>Comments noted with regards to housing numbers - DTC has been engaged with relevant authorities to ensure clear position of housing provision taken by LDC for the GBBCHMA.</p>



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LP2040 614	Peter Fawcett - Gladman	SP12 - Housing Provision	N/A	N/A	No	No	N/S	Concerned that the evidence that has been presented on housing need and supply across the wider GBBCHMA is unreliable and that this does not therefore provide a sound approach for setting the needs of the district over the period 2018 to 2040. The knock-on effect of this is that the proposed 'stepped approach' to housing delivery within SP12 fails the tests of soundness as it is based on unreliable evidence. The delivery of homes to meet this need should not be deferred to between 2027 and 2040.	No changes required.	Comments noted with regards to housing numbers - DTC has been engaged with relevant authorities to ensure clear position of housing provision taken by LDC for the GBBCHMA.
LP2040 615	Keith Mallaber	Whole document	No	No	No	Yes	Yes	<p>Urges the Council to revisit housing apportionment within the plan in regard to unmet housing need from the GBBCHMA. Considers that the plan could provide a greater contribution given the relatively unconstrained nature of the authority. The DTC is not simply confined to housing need, with appropriately located commercial development also requiring consideration. Urges the authority consider additional both residential and commercial development in proven sustainable locations such as Fradley and Alrewas, to address wider unmet need.</p> <p>Concerns over the interpretation of the updated use class order and its implications on the HEDNA in determining employment land need within the Local Plan. Table 8: Employment Land Requirements on page 88 seeks to identify how the updated use class order impacts on the HEDNA figures used. Of specific note is the Council's consideration that B2 uses are now encompassed by Class E. This is in fact not the case, class B2 and B8 remain relevant for the purposes of planning, it is only B1 uses which are now encompassed by Class E. Contends that the real employment requirement may be higher than that mooted, as is considered in the HEDNA in Table 63 which identifies a possible requirement of 144.6ha based on completion trend scenarios.</p> <p>The plan has increased the proposed employment land allocation from 61ha to 85ha between the preferred options and submission drafts. What is not clear from the plan however is how and where this additional 24ha will be accommodated within the District. In particular we would note that the adopted Local Plan identifies a requirement of 79.1ha of employment sites to meet need up to 2029. Given the lack of any clear growth direction and vagueness in possible allocations identified in the ELAA coupled with reliance on permitted sites, this gives rise to the possibility of 'double counting' between the adopted and emerging Local Plans.</p> <p>Questions whether the adequate justification has been given to the need for Green Belt release and the possible alternatives available to the Council. Considers that sustainable transport hubs such as Fradley and Alrewas have not been utilised to their full potential in accommodating new growth, particularly when noting the plans for a New Railway Station intended to serve Fradley and Alrewas. These plans are identified in the West Midlands Strategic Transport Plan and Movement for Growth: 2026 Delivery Plan for Transport,) which notes the re-opening of passenger services and provision of a new Railway Station in the locality as a strategic priority.</p> <p>The evidence base available to Lichfield in terms of sustainable transport is not sufficiently up to date to provide an accurate assessment of sustainable transport opportunities. Nearly 50% of potential employment land being relied on by the Council to come forward is made up of sites with no detailed assessment, no deliverability or viability study, and no fundamental allocation within the emerging Local Plan. Contends that the</p>	No changes required.	<p>Local Plan 2040 identifies sufficient employment land to meet employment land requirements.</p> <p>Housing requirement within the Local Plan 2040 provides for the Local Housing Need (LHN) as established by the Standard Methodology and supported by evidence within the HEDNA. Local Plan 2040 provides contribution toward unmet needs arising from the GBBCHMA, contribution is considered to be appropriate and soundly based.</p> <p>Full transport evidence is in the process of being undertaken following delays due to the Coronavirus pandemic.</p>
LP2040 616	Mark Rose (Define) - Bloor Homes	SP1	Yes	Yes	No	Yes	Yes	<p>Suggests that there is clear evidence that Lichfield's local housing need is considerably higher than suggested by the standard method. Considers that LDC should be working on a minimum housing need of 500 dwellings per annum, which would provide a base housing need of 11,000 dwellings over the plan period. Objects to the level of LDC's contribution towards the HMA shortfall. LDC should provide justification and explanation of the reduction in this figure between Preferred Options and Regulation 19 versions of the plan. The SA has not revisited the overall housing requirement that is now proposed. The level of contribution should be at least 4,500. LDC's decision to reduce this contribution fails to address cross-boundary strategic matters. There is also no justification of the decision to cap the contribution to the Black Country's unmet need to 2000 dwellings. LDC's contribution to BCC's needs of 165 dwelling is significantly short given LDC's location near to Birmingham. LDC have also failed to take into account the 35% uplift which will have increased the unmet need in neighbouring authorities. On this basis the plan is not positively prepared or justified.</p> <p>LDC's housing supply figure of 13,306 dwellings is incorrect. It should be 12,206 to take account of the fact that the North East of Lichfield SHA will not be fully delivered within the plan period. Due to various remediation issues the site is likely to deliver 1,200 dwellings in the plan period, resulting in a further 1,000 dwelling reduction in supply. Taking this into account the actual supply in the plan period is 11,206 dwellings which would be insufficient to meet the housing requirement suggested above of 15,500 dwellings. LDC must therefore identify sufficient sites to meet the increased housing need of 15,500 dwellings, particularly sites that were proposed to be safeguarded for future development in the Regulation 18 version of the plan.</p> <p>Supports the release of green belt sites and considers this justified and sound, particularly the allocation of the site at Mile Oak (SHA2) which is located next to a sustainable settlement.</p>	No changes required.	<p>Support for allocation of SHA2 noted.</p> <p>Local Plan 2040 proposes to provide 2665 dwellings to meet unmet needs from the GBBCHMA with 2000 towards the shortfall arising from the Black Country. This is in addition to unmet need provided in the adopted local plan. The 2020 Position Statement identifies that the unmet need arising from the Black Country will emerging from 2027/28. Explanatory text within the plan sets out that the stepped approach is based upon local evidence of delivery and the 2020 Position Statement. Evidence on recent delivery suggests there has been a significant increase, however when compared over the plan period as a whole the average delivery is lower. Considered appropriate to consider delivery over the medium-long term. Local Plan 2040 proposes four strategic allocations and includes a significant number of smaller 'saved' allocations from the current local plan which will continue to deliver significant homes to meet the housing requirement to 2040.</p>
LP2040 617	Lichfield Civic Society (Roger Hockney)	Whole document	Unanswered	No	No	Yes	Yes	The authority has not acted fairly and reasonably in a procedural sense. The sustainability appraisal did not evaluate the 'likely significant effects' using the evidence base. Instead the SA reports assess alternatives based on the planning authority's intended policy impact even where this is contrary with the Council's own evidence. Where factual errors were raised in earlier consultation these comments were not conveyed to the SA consultants hence consultees were denied an early and effective opportunity to influence the development plan policies. Proposed spatial strategy undermines housing delivery objective as well as employment and economic development objective because SP1 deliberately concentrates development where mortgaging rationing will deter inward migration. Policy is not justified as any policy which deters inward migration necessarily undermines the objective of meeting housing need in full. Policy SP1 deters inward migration for younger aged workers and therefore undermines the justification for SP13. Spatial Strategy is not deliverable as it relies on market demand for housing which is contingent on adequate mortgage financing being available. Lichfield's median house prices are twice the Bank of England's mortgage lending limit. Spatial strategy concentrates development in expensive areas. A better policy balance should be struck between locations which encourage inward migration through improved mortgage availability (cheaper housing).	No changes required.	Local Plan 2040 has been subject to three previous rounds of public consultation prior to the regulation 19 consultation. All consultations have been conducted in accordance with the Council's adopted Statement of Community Involvement. Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence.
LP2040 618	Lichfield Civic Society (Roger Hockney)	Whole document	Unanswered	No	No	Yes	Yes	Do not consider the spatial strategy/settlement hierarchy to be justified or effective. SP1 will be to constrain the supply of new homes by restricted access to the mortgage market and thereby depressing inward migration. Consequently the plans housing requirement is undeliverable because the supply of new homes will be demand limited. Housing land supply which consistently exceeds demand will result in accumulation of undeveloped land as is currently the case. While it may be national policy to "significantly boost" the supply of new homes, there is no corresponding policy commitment regarding the availability of mortgage finance. Mortgage providers must manage lending risks within strict limits. This encourages them to diversify risks by preferring a portfolio of many small mortgages over one with fewer but larger ones, and preferring, less risky, lower loan-to-income loans. This puts Lichfield at a competitive disadvantage but results in more homes being built and more people housed in neighbouring areas.	No changes required.	Local Plan 2040 has been subject to three previous rounds of public consultation prior to the regulation 19 consultation. All consultations have been conducted in accordance with the Council's adopted Statement of Community Involvement. Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence.
LP2040 619	Lichfield Civic Society (Roger Hockney)	Whole document Sustainability appraisal	Unanswered	No	No	Yes	Yes	Lichfield Civic Society considers that the Sustainability Assessment is not robust regarding the likely effect of implementing the spatial strategy/settlement hierarchy. The report is defective in the following areas: (i) Mortgage market reforms, introduced following the global financial crisis, is a relevant programme and should be added to Appendix A of the SA Scoping report (Nov/2020). Similarly Bank of England mortgage lending restrictions are government policy and should be recognised as such. (ii) Given the compelling evidence, consistent across decades and across the housing market area, the Sustainability Appraisal is not justified in ignoring evidence of adverse impacts (in the evidence base) and substituting positive impacts based on the author's judgement. (iii) The defects in the Sustainability Appraisal should be addressed and there should be further public consultation where the policy impact is more accurately described and set of reasonable alternatives is presented for comment.	No changes required.	Local Plan 2040 has been supported by evidence including Sustainability Appraisal at all stages of plan progression. Lichfield District Council considers the Sustainability Appraisal to have been prepared in accordance with relevant regulations and guidance.

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LP2040 620	Lichfield Civic Society (Roger Hockney)	Policy SP1	Unanswered	No	No	Yes	Yes	Set out below is a summary of the Lichfield Civic Society's comments regarding policy SP1: (i) The draft plan proposes a continuation of the existing spatial strategy / settlement hierarchy, which is a significant contributor to housing completion rates falling compared to the long-term average – refer Table 8 below. The adopted plan's historic completions (2008–2017) combined with the draft plan's housing trajectory (Policy SP12 2018–2027) shows that Lichfield District Council do not expect a significant increase in new home deliveries for 19 years after Northern Rock's collapse. (ii) Since the draft plan relies on market demand to stimulate house building — and 70-80% of home buyers require a mortgage — the evidence base should demonstrate that the draft plan is deliverable within Bank of England mortgage lending regulations, and that developer contributions (affordable housing, schools, highways, etc.) are deliverable at house prices which could enable outward migrants from Birmingham to secure a mortgage in the District. (iii) If the District Council had performed the analysis described in point (ii) above, it would have realised that concentrating residential land allocations where homes are most expensive, maximises mortgage rationing and thereby chokes off inward migration. Therefore the economic effect of the spatial strategy is to undermine the policy objective of significantly boosting the supply of homes. (iv) The spatial strategy causes further social harms because it undermines economic growth by deterring inward migration of workers (due to mortgage rationing) and adds to the social care burden by accelerating the rate at which the District's population is ageing.	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Local Housing Need is calculated in accordance with the Standard method produced by Government and is supported by evidence within the HEDNA.
LP2040 621	Lichfield Civic Society (Roger Hockney)	Policy SP12	Unanswered	No	No	Yes	Yes	(i) This Plan review is required by the Allocations DPD (policy LPR), to implement an existing commitment to help address unmet cross-boundary housing needs in the housing market area. It is a matter of "soundness" that policy SP12 must be effective (deliverable over the Plan period) and that the housing provision policy / spatial strategy must be justified (an appropriate strategy given reasonable alternatives & proportionate evidence). (ii) The draft Plan's housing provision policy reflects the spatial strategy which incorporates the settlement hierarchy. The economic effect of concentrating residential land allocations where homes are most expensive is to undermine national policy which seeks to "significantly boost the supply of homes". This occurs because the spatial strategy maximises mortgage rationing, thereby chokes inward migration. (iii) The draft Plan largely incorporates existing development plan policies which failed to boost the supply of homes (iv) The draft Plan is reliant on market demand to stimulate house building (including an affordable housing percentage). The Plan's housing trajectory is for 321dpa 2018–27, then 526dpa to 2040. ONS household growth projections (given current [pre-COVID/pre EU single market exit] policies & economic conditions) range between 190dpa and 240dpa for the 2014/16/18 based projections. Therefore the Plan's housing delivery target is significantly in excess of the equilibrium point where private enterprise housing supply matches housing demand (arising from trend based migration). (v) A "passive" strategy which allocates land to accommodate inevitable (trend based) migration will be insufficient. The proposed housing trajectory (equivalent to 170–270% of trend based migration) requires active policy support to stimulate inward migration, recognising the competitive environment with other HMA authorities (with cheaper housing) seeking to attract migrants to existing land allocations. Suggest the following market signals should be considered: The substantial land availability across the HMA A glut of undeveloped housing land has accumulated because new land allocations persistently exceed land utilisation. The District's high house-price-to-earnings ratio restricts mortgage availability – a higher price-to-earnings ratio means less mortgage availability and fewer migrants. The District is at a competitive disadvantage vs. neighbours. Lichfield District's net inward migration rate has halved – with negative natural change (deaths exceed births), the District's population change is determined by migration Mortgage rationing, due to concentrating residential land allocations where homes are expensive, has halved migration, while neighbours (with cheaper housing) have seen migration double. The District's housing land supply is sluggish – Across the HMA both new build & existing dwelling sales increased after Q4/2012, while in Lichfield existing dwelling sales increased in tandem with the HMA but new build sales lagged 4 years behind. Lichfield's new build sales only increased substantially after Brexit related bulk disposals to housing associations. The sluggish nature of the new build market is hardly surprising given restricted mortgage availability combined with a concentration of large sites in a small geographic area. (vi) Achieving the proposed housing target requires adequate availability of mortgage loans. A number of policy reforms were introduced following the global financial crisis to ensure that banks held additional capital and better controlled risks. Tighter regulation of mortgage lending ensures that banks limit their exposure to risky loans and that individuals do not take on debts that they will struggle to service. The draft local Plan 2040 needs to take account of the new regulatory environment and ensure that the housing target can be delivered within these policy constraints. (vii) To remedy the	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Local Housing Need is calculated in accordance with the Standard method produced by Government and is supported by evidence within the HEDNA.
LP2040 622	Lichfield Civic Society (Roger Hockney)	Policy SP13	Unanswered	No	No	Yes	Yes	Set out below is a summary of the Lichfield Civic Society's comments regarding Employment & Economic Growth: Policy SP13 will not "enhance [the] local economy" or "provide employers with access to a skilled labour force" because it is undermined by the Spatial Strategy / Settlement Hierarchy (Policy SP1); The cumulative harm of the Spatial Strategy / Settlement Hierarchy is clearly evident. Since the adopted Plan was prepared the District's population growth rate has halved; Lichfield's population is ageing very rapidly – only 8.8% of the total population growth will be in the 25-64 year age band, compared to 37.6% for Birmingham and the Black Country. This is caused by a shortfall in (younger) working-age migrants over a prolonged period. The reasons are set out in the Society's comments on policy SP1 ( Spatial Strategy) and policy SP12 (Housing provision); Net outward migration from Birmingham and the Black Country has slowed significantly – refer Table below, although some authorities (with cheaper housing) performed strongly – refer Table 9 above; Net migration to South/South East of HMA has increased significantly, probably due to more expensive housing in the Cotswolds, Oxfordshire & London (HS2) combined with well-paid local jobs. Strategic Policy 13 should recognise that high-speed broadband combined with homes suitable for remote working can boost economic and employment growth, reduce cross-boundary commuting (helping the environment) and reduce the need for retail and office space. This is especially true for Lichfield District with its high % of employment in the services sector.	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Local Housing Need is calculated in accordance with the Standard method produced by Government and is supported by evidence within the HEDNA.
LP2040 623	Mark Rose (Define) - Bloor Homes	SP1	Yes	Yes	No	n/a	Yes	Have fundamental concerns in relation to the quantum of development for which the emerging Local Plan Review (LPR) seeks to plan for, and the approach taken to the allocation of housing sites at Lichfield, which undermines the soundness of the plan. Strongly object to the level of LDC's contribution towards the unmet needs arising within the GBBCHMA. LDC's proposed contribution towards addressing the unmet needs (2,665 dwellings) is significantly less than the 4,500 dwellings that was proposed in the 'Preferred Options' (Regulation 18) version of the LPR. The decision to reduce the contribution comes in the context of the evolving unmet need without any explanation or justification. LDC should seek to accommodate at least 4,500 dwellings above its LHN as a contribution towards those unmet needs. Consider LDC's overall housing requirement should be at least 15,500 dwellings (11,000 dwellings to meet LDC's own housing needs, plus a 4,500 dwelling contribution to neighbouring authorities' unmet needs), and potentially higher should the revised SA identify that a further increase to the contribution could be accommodated.	No changes required.	Housing requirement within the Local Plan 2040 provides for the Local Housing Need (LHN) as established by the Standard Methodology and supported by evidence within the HEDNA.  Local Plan 2040 proposes to provide 2665 dwellings to meet unmet needs from the GBBCHMA with 2000 towards the shortfall arising from the Black Country. This is in addition to unmet need provided in the adopted local plan. The 2020 Position Statement identifies that the unmet need arising from the Black Country will emerging from 2027/28. Local Plan 2040 proposes four strategic allocations and includes a significant number of smaller 'saved' allocations from the current local plan which will continue to deliver significant homes to meet the housing requirement to 2040.
LP2040 624	Mark Rose (Define) - Bloor Homes	SP3	Yes	Yes	No	Yes	Yes	The policy is not considered to be consistent with the NPPF or other national guidance in relation to EVCP provision. The requirement is not considered to be "deliverable" in accordance with NPPF Paragraph 16b, by virtue of the practicalities and significant cost of providing EVCP; which will need to be taken into account alongside all other development requirements. That too was highlighted in the Government's consultation, which set out that the installation of charging points will result in an additional cost of approximately £976 per dwelling. That cost is only increased further where plots are served by remote parking (whereby the provision of EV charging is impractical in some cases, as well as costly). There are concerns also regarding if the existing infrastructure could accommodate such provision, the level of upgrade needed is dependent on the capacity available in the local network and would potentially result in significant additional costs for the developer and for the distribution network operator. That too is recognised by the Government in the consultation. As such, the requirement for provision of EV charging in every space is clearly not in compliance with the NPPF and other Government guidance Given that the requirement for EVCPs for all parking spaces is not justified, would pre-empt the Government's publication of its own guidance via the Building Regulations, and would have a significant development cost that may render the policy requirement un deliverable, the policy requirement should be removed in its entirety.	No changes required.	Policy seeks to ensure appropriate charging points for electric vehicles are provided within new development. Policy is considered appropriately flexible to allow for appropriate connections to be provided. SCC already request for such provision.

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LP2040 625	Mark Rose (Define) - Bloor Homes	SP4	Yes	Yes	Yes	N/A	Yes	Support policy - particularly LDC's aspiration to construct a rail line between Walsall and Lichfield, as delineated on the Policies Map	No changes required.	Support noted.
LP2040 626	Mark Rose (Define) - Bloor Homes	INF1	Yes	Yes	No	Yes	Yes	The intention of that policy is recognised, the policy should recognise the role of a wide range of actors in delivering infrastructure. In doing so, the policy should be more explicit to encourage the proactive involvement of actors within infrastructure delivery. 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.	No changes required.	LDC has engaged with a number of infrastructure providers throughout the local plan review process and consider the policy to be sufficient and sound.
LP2040 627	Mark Rose (Define) - Bloor Homes	SP10	Yes	Yes	No	Yes	Yes	The approach to sustainable development as set out in SP10 is recognised. However, some aspects of the policy must be refined to ensure that the policy is in accordance with NPPF paragraph 16d. As currently drafted, that wording is not clear and should be clarified to make clear that the intention is that new development should not cause air quality limit values to be exceeded	No changes required	Consider policy is consistent with national planning policy.
LP2040 628	Mark Rose (Define) - Bloor Homes	SD1	Yes	Yes	No	N/A	Yes	Support the intent of Local Policy SD1. However, NPPF paragraph 127 states that plans should "set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable", with the Government's PPG (Ref. 26-004-20191001) stating that "non-strategic policies can be used to establish more local and/or detailed design principles for an area." Consider Local Policy SD1 as currently drafted fails to meet those requirements, in that it adds little to the design guidance provided in Chapter 12 of the NPPF.	No changes required	Support noted. Consider policies provide sufficient clarity for the decision-maker.
LP2040 629	Mark Rose (Define) - Bloor Homes	SP11	Yes	Yes	No	N/A	Yes	Consider, LDC must identify further safeguarded sites for development beyond the plan period to ensure that it does not have to revisit its Green Belt boundaries during the next plan period.	No changes required	Safeguarded land is not considered to be required within the Local Plan 2040, particularly given Governments stated intent to introduce new planning system.
LP2040 630	Mark Rose (Define) - Bloor Homes	SD2	Yes	Yes	No	N/A	Yes	The policy is not clear whether on-site renewable energy and low carbon energy generation is required, or whether off-site provision is acceptable. LDC should not seek to pre-empt requirements for renewable and low carbon energy that are soon to be set within the Government's Building Regulations and Future Home Standards. Rather, it would be more suitable to seek renewable and low carbon energy provision in accordance with Government policy/Building Regulations, to ensure that the policy does not quickly become out-of-date after the plan's adoption.	No changes required	Policies within the Local Plan seek to address the impacts of climate change. This is supported by the Staffordshire Climate Change, mitigation and adaptation study which forms part of the evidence base.
LP2040 631	Mark Rose (Define) - Bloor Homes	SP12	Yes	Yes	No	N/A	Yes	LDC's proposed contribution towards addressing the unmet needs (2,665 dwellings) is significantly less than the 4,500 dwellings that was proposed in the 'Preferred Options' (Regulation 18) version of the LPR. The decision to reduce the contribution comes in the context of the evolving unmet need without any explanation or justification. LDC should seek to accommodate at least 4,500 dwellings above its LHN as a contribution towards those unmet needs. Consider LDC's overall housing requirement should be at least 15,500 dwellings (11,000 dwellings to meet LDC's own housing needs, plus a 4,500 dwelling contribution to neighbouring authorities' unmet needs), and potentially higher should the revised SA identify that a further increase to the contribution could be accommodated.	No changes required	Housing requirement within the Local Plan 2040 provides for the Local Housing Need (LHN) as established by the Standard Methodology and supported by evidence within the HEDNA.  Local Plan 2040 proposes to provide 2665 dwellings to meet unmet needs from the GBBCHMA with 2000 towards the shortfall arising from the Black Country. This is in addition to unmet need provided in the adopted local plan. The 2020 Position Statement identifies that the unmet need arising from the Black Country will emerging from 2027/28. Local Plan 2040 proposes four strategic allocations and includes a significant number of smaller 'saved' allocations from the current local plan which will continue to deliver significant homes to meet the housing requirement to 2040.
LP2040 632	Mark Rose (Define) - Bloor Homes	H1	Yes	Yes	No	n/a	Yes	In order to ensure that Local Policy H1 is justified in relation to the optimum housing mix sought by LDC, the policy must have regard to market demand, specifically in relation to the demand for larger houses from individuals that would be expected to have a 'need' for smaller houses. As such, the optimum housing mix should allow for a higher percentage of 3-bedroom and 4+ bedroom dwellings, reducing the percentage of 1-bedroom and 2-bedroom dwellings that is currently being sought. The policy should provide extra clarity in relation to the density expected within urban extensions at the fringes of Lichfield city. The proposed requirement for 5-10% of market homes, 10-20% of affordable homes in ownership, and 20-30% of rented affordable homes to be 1-bedroom dwellings does not reflect the true demand for housing, and rather is informed only by a numeric calculation of 'need' that overlooks the market context.	No changes required	Policy H1 is based upon up to date evidence within the HEDNA which details the housing mix required to meet the District's housing need based upon demographics. The policy provides flexibility within each type/size of house to ensure the policy is flexible.
LP2040 633	Mark Rose (Define) - Bloor Homes	H2	Yes	Yes	No	Yes	Yes	Note the importance of providing affordable housing to meet the needs of the District, and as such recognise the intention of the policy. The policy seeks to establish an affordable housing requirement of 20% for strategic non-allocated Greenfield sites, and 35% for non-strategic non-allocated Greenfield sites. Consider the strategic site threshold should be reduced to 400 dwellings to align with the Council's evidence base. In addition, whilst it is appropriate to set a target for affordable housing based on the evidence produced to date, the ability to carry out a viability assessment and alter the level of affordable housing provision based on viability considerations should not only be reserved for strategic sites as is currently the case in Local Policy H2. Consider policy be re-drafted to revise the threshold for strategic sites to 400 dwellings or above, and the policy should make clear that Viability Assessments may be undertaken by sites of all sizes and typologies when negotiating the level of affordable housing to be provided within a site.	No changes required	Local Plan 2040 includes policy which seeks to deliver the maximum level of affordable housing whilst ensuring development remains viable. This is supported by evidence within the HEDNA and viability evidence.
LP2040 634	Mark Rose (Define) - Bloor Homes	NR1	Yes	Yes	No	Yes	Yes	Support policy intention however, the NPPF no longer seeks to preclude development by applying a blanket protection of the countryside for its own sake (as had existed in previous national guidance). Instead the NPPF states that policies and decision should recognise the intrinsic character and beauty of the countryside in its widest sense (NPPF paragraph 174b) whilst also seeking to balance the need for housing in rural areas, and ensuring that policies are responsive to local housing needs (NPPF paragraph 78) and also promote sustainable development in rural areas (NPPF paragraph 79). Thus, the policy should be re-drafted to ensure that it accords with the NPPF in this regard. As the NPPF no longer seeks to preclude development by applying a blanket protection of the countryside for its own sake, the policy should be reviewed with reference to the NPPF and its position in relation to development within the countryside.	No changes required	Support noted.
LP2040 635	Mark Rose (Define) - Bloor Homes	SP17	Yes	Yes	No	Yes	Yes	Whilst the scope of SP17 is recognised, the policy requirements are contrary to the NPPF in some cases. Whilst it is not desirable to have any impact on heritage assets, NPPF paragraph 202 states that development proposals should be permitted where they have less than substantial harm to the significance of a designated heritage asset, so long as the harm is outweighed by the public benefit; and as such, those policy requirements go over and above the requirements of the NPPF and are contrary to the NPPF in that regard. For SP17 to be considered in accordance with the NPPF, and therefore sound, the policy should be reviewed with reference to NPPF paragraph 202 in particular. The policy should not go over and above the thresholds.	No changes required	Support noted.
LP2040 636	Mark Rose (Define) - Bloor Homes	SHA1	Yes	Yes	No	Yes	Yes	Have significant concerns in relation to the deliverability of the proposed allocation over the plan period, and as such the effectiveness of the policy. DC must increase its contribution towards the unmet housing needs of the wider HMA in any case, this uncertainty in the level of supply to be delivered at a key component of the LPR's housing supply is a critical concern and provides further evidence that additional residential allocations should be identified to make the LPR "sound".	No changes required	Housing requirement within the Local Plan 2040 provides for the Local Housing Need (LHN) as established by the Standard Methodology and supported by evidence within the HEDNA.
LP2040 637	Mark Rose (Define) - Bloor Homes	Sustainability Appraisal	Yes	Yes	No	N/A	Yes	Consider the SA to be fundamentally flawed, and has failed to judge development sites on the basis of "proportionate evidence" and therefore has also failed to take into account "the reasonable alternatives" available to LDC in terms of potential residential allocation sites. Therefore, the scope and methodology of the SA cannot be considered to be justified in accordance with NPPF paragraph 35b. For the SA to be considered justified and therefore sound, it must be revisited to ensure the consistent application of the methodology across promoted sites, and also should take into account each site in its context and, where provided, consider the potential benefits of proposed development schemes.	No changes required	Local Plan 2040 has been supported by evidence including Sustainability Appraisal at all stages of plan progression. Lichfield District Council considers the Sustainability Appraisal to have been prepared in accordance with relevant regulations and guidance.



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LP2040 638	Mitchell Barnes (Summix Planning Limited) on behalf of Summix BLT Developments LLP	Whole document	No	No	No	Yes	Yes	<p>The proposed requirement is considered to be too low, with evidence to suggest a greater local housing needs figure should be provided for. Previous assessments of housing need have indicated that a local housing need of between 410 and 450 dwellings per annum is needed.</p> <p>These assessments informed the preparation of the adopted Local Plan Strategy, with the Inspector satisfied that such a level of need existed in the district. It is considered that there is no evidence to justify that local needs have fallen, with no change in local housing market circumstances. In fact, affordability in the area has deteriorated, whilst inward migration has increased. On this basis the local housing need should be 450 per annum with a contribution of 205 per annum from 2029 to the GBBCHMA. This would see an additional 2,838 dwellings required over the plan period (up to 2040).</p> <p>Elements of the third position statement published by the GBBCHMA authorities in September 2020 are unsound and the scenarios presented reveal a significant unmet need remains across the HMA to 2031. Evidence shows that best case the shortfall to 2031 is nearly 19,000 dwellings.</p> <p>The spatial strategy identifies 'North of Tamworth' as a 'Level 2' growth area, which operates as a Level 2 area, alongside Rugeley and Burntwood and below only Lichfield (Level 1). The spatial strategy identifies that approximately 8% of housing will be provided north of Tamworth. 8% of the total housing provision (as currently proposed) equates to 778 dwellings.</p> <p>The proposed strategic allocations at Fazeley, Whittington and Fradley are all targeting growth at Level 3 settlements. There are no strategic sites proposed in the areas identified at Level 2.</p> <p>The emerging plan fails to identify any additional sites to the North of Tamworth, therefore not providing the approximate 8% (778 dwellings) of housing provision stated in table 4 of the pre-submission plan. The proposed strategy for identifying sites fails to take account of the settlement hierarchy.</p> <p>Given the additional need that is being suggested, the Local Plan should seek to identify additional sites, in accordance with the spatial strategy, to adequately address the new requirement</p>	No changes required.	<p>Housing requirement within the Local Plan 2040 provides for the Local Housing Need (LHN) as established by the Standard Methodology and supported by evidence within the HEDNA.</p> <p>Local Plan 2040 proposes to provide 2665 dwellings to meet unmet needs from the GBBCHMA with 2000 towards the shortfall arising from the Black Country. This is in addition to unmet need provided in the adopted local plan. The 2020 Position Statement identifies that the unmet need arising from the Black Country will emerging from 2027/28. Local Plan 2040 proposes four strategic allocations and includes a significant number of smaller 'saved' allocations from the current local plan which will continue to deliver significant homes to meet the housing requirement to 2040.</p>
LP2040 639	Mitchell Barnes (Summix Planning Limited) on behalf of Summix BLT Developments LLP	Whole document	No	No	No	Yes	Yes	<p>The proposed Strategic policy 1 (SP1): The spatial strategy states "Across the district, growth will be directed towards sustainable locations broadly in accordance with the settlement hierarchy (Table 4)....". The principle of development is accepted to the north of Tamworth by the emerging Local Plan 2040, due to its designation at level 2.</p> <p>It is considered that land at Browns Lane, is located within a level 2 area (north of Tamworth) is an acceptable site which can come forward to assist with the additional housing requirement. It is evident that this site is in accordance with the emerging spatial strategy, and therefore a sustainable location for new development.</p> <p>Summix Planning Limited have been actively collaborating with Staffs CC Highways to identify an agreed highway solution for the development since February 2021. The final details of the highway scheme have been agreed and a cost for the scheme is in the process of being finalised for consideration and sign off by Staffs CC. Discussions regarding the highways scheme have been in the context of the Secretary of State's decision to allow the Arkall Farm proposal (3174379), where the SoS approved the use of the Monitor and Manage approach. The SoS also acknowledged that the full scheme may not be implementable without a CPO. These proposals will assist in bringing forward significant highways benefits through the implementation of the agreed highways works.</p> <p>The local housing need should be 450 per annum, and the contribution of some 205 dwellings per annum towards the GBBCHMA, the housing requirement should be increased. Evidence clearly shows that, best case, the shortfall to 2031 is nearly 19,000 dwellings.</p>	No changes required.	<p>Housing requirement within the Local Plan 2040 provides for the Local Housing Need (LHN) as established by the Standard Methodology and supported by evidence within the HEDNA.</p> <p>Local Plan 2040 proposes to provide 2665 dwellings to meet unmet needs from the GBBCHMA with 2000 towards the shortfall arising from the Black Country. This is in addition to unmet need provided in the adopted local plan. The 2020 Position Statement identifies that the unmet need arising from the Black Country will emerging from 2027/28. Local Plan 2040 proposes four strategic allocations and includes a significant number of smaller 'saved' allocations from the current local plan which will continue to deliver significant homes to meet the housing requirement to 2040.</p>
LP2040 640	David Onions (Pegasus Group) Wilson Bowden Developments Ltd.	INF4	No	No	No	Yes	Yes	<p>It's important that Policy INF4 reflects the importance of development providing green infrastructure, open space and playing pitches where appropriate in line with up-to-date evidence but also through meeting identified local need, whether this is reflected through Neighbourhood Plans or other consultation with the local community/local evidence. Policy INF4 should be amended to reflect this.</p>	No changes required.	<p>Local Plan is supported by up to date evidence in respect of open spaces and playing pitches.</p>
LP2040 641	Neville Ball (Association of Black Country Authorities)	SP1 SP12	Yes	Yes	No	Yes	Yes	<p>Table 7 of the Plan indicates that there is capacity in the district for 13,306 homes. However, policies SP1 and SP12 only propose delivery of a minimum of 9,727 homes between 2018 and 2040, of which 2,665 are to meet the needs of Birmingham and the Black Country. This is a substantial reduction from the previous Regulation 18 version of the plan, which proposed a total of 11,782 homes, of which 4,500 homes were to meet the needs of Birmingham and the Black Country.</p> <p>We would note that paragraph 4.21 of the Lichfield Plan says "This statement details that the need arising from Birmingham in particular has primarily now been met. Additionally, unmet need arising from the Black Country authorities is detailed within the position statement and it is anticipated this need will begin to arise part way through the plan period from 2027/28 onwards." It also pre-dates the publication of the revised standard method for calculating local housing need which adds a 35% uplift to the housing needs of Birmingham and Wolverhampton. At that time Birmingham's plan was less than 5 years old so the housing need of the city was capped. This cap has now been removed following the 5 year anniversary of the plan in January 2021.</p> <p>Any local plan that is intended to cover the period post 2031 should address the shortfall over the full period of that plan (i.e. to 2040), based on the latest calculation of local housing need for all the relevant authorities using the standard method, and including the effects of the urban area uplift (for Birmingham and Wolverhampton) as well as the ending of the 5 year post-adoption cap on Birmingham's need.</p> <p>Paragraph 8.6 (which refers to table 6 rather than table 7) states that the difference between the supply and the proposed housing target is to provide a buffer, however the difference between 13,300 and 9,727 homes in these two figures appears rather large.</p> <p>Paragraph C.10 refers to monitoring and the circumstances that may give rise to a review of the local plan. Request that either this text is elaborated on or preferably that the Plan contains an early review mechanism. This should firmly commit the Council to work collaboratively with neighbouring authorities to objectively establish the scale and distribution of any emerging housing and employment shortfalls. The Lichfield plan should therefore increase its housing target to match the deliverable supply shown in table 7, in line with the Government's objective in paragraph 60 of the NPPF of significantly boosting the supply of homes.</p>	Minor modification proposed to text of paragraph 8.6 to correct reference to Table 6 to Table 7. Minor modification to correct this factual error to be proposed.	<p>Local Plan 2040 proposes to provide 2665 dwellings to meet unmet needs from the GBBCHMA with 2000 towards the shortfall arising from the Black Country. This is in addition to unmet need provided in the adopted local plan. The 2020 Position Statement identifies that the unmet need arising from the Black Country will emerging from 2027/28. Explanatory text within the plan sets out that the stepped approach is based upon local evidence of delivery and the 2020 Position Statement. Evidence on recent delivery suggests there has been a significant increase, however when compared over the plan period as a whole the average delivery is lower.</p> <p>District Council will prepare statements of common ground with those partners. In respect of the 35% uplift to Local Housing Need of cities this applies only to those authorities and guidance states this should not be met outside of the city authorities.</p>
LP2040 642	Alastair Bird (Barton Wilmore) Church Commissioners	SP1	Unanswered	Unanswered	No	Yes	Yes	<p>Promotes sites to the north-west of Burntwood. Proposal has the potential to accommodate approximately 375 dwellings. Policy SP1 is unsound as drafted as it fails to provide sufficient market and affordable housing over the plan period both the meet the Council's local need as well as wider unmet needs arising from the GBBCHMA. Local Housing Need should only be the starting point in respect of calculating local housing requirements. HEDNA demonstrates a significant need for affordable homes in comparison to the overall level of housing need. Despite this the Council has chosen not to adjust the local housing requirement. Consider that the Council should look to provide an uplift to its local housing need figure to allow the delivery of additional affordable housing. Council propose 2665 dwellings to meet unmet need from the HMA, a decrease from 4500 set out at Preferred Options. Object to the 2020 Position Statement. No contribution within adopted plan to meet Birmingham City's unmet need. Through the preparation of the review of the Black Country Local Plan evidence suggest further unmet need. LDC should increase their contribution to accommodating unmet housing need.</p>	No changes required.	<p>Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Local Housing Need is calculated in accordance with the Standard method produced by Government and is supported by evidence within the HEDNA.</p>
LP2040 643	Alastair Bird (Barton Wilmore) Church Commissioners	SP11	Unanswered	Unanswered	No	Yes	Yes	<p>Consider the 2021 Green Belt Review to be unsound as it incorrectly assess the site promoted.</p>	No changes required.	<p>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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LP2040 644	Alastair Bird (Barton Wilmore) Church Commissioners	SP12	Unanswered	Unanswered	No	Yes	Yes	In terms of Burntwood this only receives 4% of the housing requirement. It is understood that no further dwellings are required to come forward over the plan period. Whilst it is understood that opportunities will be taken to deliver brownfield opportunities it is likely that no major developments will come forward at Burntwood at least up to 2040. Should additional housing be required across the District it is considered that Burntwood would provide a suitable and sustainable location to accommodate a proportion of this need. Behind Lichfield, Burntwood provides the most sustainable location for growth with a wide range of services and facilities. Indeed without the provision of sufficient market and affordable housing within Burntwood over the Plan period, it could lead to a decline in the shops and services available.	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Spatial Strategy of the plan, including proposed allocations, are supported by evidence base.
LP2040 645	Alastair Bird (Barton Wilmore) Church Commissioners	Paragraph 4.35	Unanswered	Unanswered	No	Yes	Yes	Explains that an Area Action Plan (AAP) for Burntwood will be prepared. Support the Council's aspiration to prepare an AAP. It is important to note that the neighbourhood plan was prepared against the adopted Local Plan. Given the AAP would be prepared against the Local Plan 2040 it would be unsound for it to directly align with the neighbourhood plan. It will need to cover issues which extent over the new plan period - to 2040. Suggest additional wording added to allow the AAP to be positively prepared and provide for the opportunity for additional housing development to come forward in the event of a shortfall in the plan period.	No changes required.	Local Plan sets out the Area Action Plan to be progressed following the adoption of the Local Plan 2040 and will be in accordance with the adopted Development Plan. Burntwood Neighbourhood Plan was recently adopted and forms part of the adopted Development Plan in the District.
LP2040 646	Neville Ball (Association of Black Country Authorities)	SP13	Yes	Yes	No	Yes	Yes	Concerning the employment land supply, notes that policy SP13 proposes the allocation of 85 hectares of employment land, compared with the figure of 61 hectares proposed in the draft plan. There is no clear indication of the reason for this increase, especially given that the housing target has been reduced, and unlike the housing land supply there is no offer of some of this to contribute to the needs of Birmingham or the Black Country. We understand that the figure of 61ha arose from a mathematical error and that the correct figure should have been 85ha. However, the supporting evidence for the Black Country Plan indicates that, as with the housing land supply, there is a shortfall of land in the Black Country for employment uses. We would therefore welcome any increase in the employment land supply if some of this could be attributed to meeting the housing needs of the Black Country.  Paragraph 9.5 appears to contradict itself in that it states there is significant further capacity for employment land but the Employment Land Availability Assessment also demonstrates that there is a limited supply of potential further options for employment growth. We are not convinced that the latter claim is credible given the apparent over-supply of housing land, some of which could be used for employment purposes if not required for housing, and the amount of land in the district that is not constrained by Green Belt or other factors.	No changes required.	Local Plan 2040 seeks to provide for the District's employment land requirements and deliver new jobs to meet these requirements. Local Plan 2040 provides contribution toward unmet needs arising from the GBBCHMA, contribution is considered to be appropriate and soundly based.
LP2040 647	Neville Ball (Association of Black Country Authorities)	SP10	Yes	Yes	No	Yes	Yes	Policy SP10 states that the council will require all development to ... "reduce carbon emissions". Nearly all development generates carbon emissions, both during construction and in subsequent use. With the exception of proposals involving the redevelopment of previously developed land or changes of use where the new development or use generates fewer carbon emissions than the previous one, development therefore normally results in an increase in emissions compared with the 'do nothing' situation. It may therefore be more effective for the policy to state that development should aim to "minimise carbon emissions"	No changes required.	Consider the policy wording as drafted is clear and appropriate.
LP2040 648	David Pickford (Pegasus) - on behalf of Daniel Wright	Vision	Yes	Yes	No	N/A	No	Vision is broadly supported, it should be amended to reflect both present and future housing requirements, including those housing pressures arising through the Duty to Cooperate with neighbouring authorities.	No changes required.	Support noted.
LP2040 649	David Pickford (Pegasus) - on behalf of Daniel Wright	SP1	Yes	Yes	No	N/A	No	The approach of delivering Lichfield District's objectively assessed housing need as a minimum figure in line with the Standard Method is supported. The pro-active approach taken to providing a contribution of dwellings towards the GBBCHMA shortfall is welcomed, along with recognition within the Policy that the Council is working under the Duty to Cooperate to address shortfalls in the wider Housing Market Area. Consistency is required within this Policy, ensuring that the policy approach of a 'minimum' housing figure for both local and HMA housing delivery is reflected throughout the Plan.  The approach to reduce the housing delivery contribution towards the wider HMA is therefore not supported, particularly given this approach has not been fully evidenced and justified. It should be considered that there may be scope for the identification of reserve sites should focus on deliverability and include a range of locations to give the housing market flexibility. Given the scale of the issue large sites will need identifying, but it is also considered that smaller scale sites adjacent to existing settlements are likely to be both relatively easy to deliver and also attractive to the market, whilst helping support existing infrastructure and facilities.  Clarification is required when referring to the 'remaining larger villages'. Policy SP1 lists all the 'Level 3' settlements as being suitable for new development within their boundaries. Support the policy direction that growth will be directed towards sustainable locations broadly in accordance with the above settlement hierarchy and consider it a sounds approach to sustainable distribution of growth. Consider Policy SP1 should be amended to ensure that 'the wider rural area' is separated out from the 'Level 4 smaller service villages' and 'Level 5 smaller rural villages', reflecting the direction and priorities for growth as identified within the Plan's Vison and Strategic Objectives. Furthermore, a policy mechanism should be set out along with the identification of reserve sites to respond to circumstances which could be restricting delivery both in the GBBCHMA and the District.	No changes required.	Comments noted with regards to housing numbers - DTC has been engaged with relevant authorities to ensure clear position of housing provision taken by LDC for the GBBCHMA.
LP2040 650	David Pickford (Pegasus) - on behalf of Daniel Wright	SP2	Yes	Yes	No	N/A	No	The principle of Policy SP2 is broadly supported, however, further consideration is required in relation to the specific wording of the policy. Clarity is required in relation to "unacceptable air quality levels" as the wording is unclear and ambiguous. The wording here should therefore be clarified, with the intention instead being that new development should not cause air quality standards to be exceeded. Although the overall principle of reducing the reliance on the car is supported in line with national policy, the wording of Policy SP2 is overly onerous and does not allow for any flexibility in line with the District's spatial strategy and the delivery of housing across the District's villages. the policy restricts much needed housing in these settlements coming forward now, where inevitably, as a result of their more rural location will require the use of the car with less regular public transport service provision. Intrinsically Lichfield is a rural district and the general approach in the Local Plan mthe Employment Land Availability Assessment also demonstrates that there is a limited supply of potent	No changes required.	Support noted.
LP2040 651	David Pickford (Pegasus) - on behalf of Daniel Wright	SP3	Yes	Yes	No	N/A	No	Broadly support SP3, however, the requirement for all major development proposals to produce a travel plan should be review and the threshold should be revised to a higher level.	No changes required.	Travel plan requirements have involved engagement with SCC highways
LP2040 652	David Pickford (Pegasus) - on behalf of Daniel Wright	LT1	Yes	Yes	No	N/A	No	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 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. Parking standards should be imposed through Local Plan policy rather than an SPD to allow for them to be tested at examination.	No changes required.	Comments noted. Local Plan 2040 does not set out parking standards. Parking Standards are contained within supplementary planning documents.



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LP2040 653	David Pickford (Pegasus) - on behalf of Daniel Wright	SP5	Yes	Yes	No	N/A	No	The provisions of policy broadly supported, however, it is considered there needs to be additional evidence published in support of the Local Plan Review in order to provide clarity over what additional infrastructure is required to support the Local Plan allocations and how this will be delivered. Although it is recognised that an updated Infrastructure Delivery Plan (IDP) has been prepared since the publication of the Preferred Options Plan, this requires further refinement following consultation with the County Council and other relevant consultees on matters such as highways modelling and education provision. The IDP sets out that Staffordshire County Council are currently updating the Integrated Transport Strategy to consider the emerging Local Plan 2040 and that future updates of the IDP will be required to reflect this evidence once it is completed, however it is important that adequate consultation is undertaken with all the relevant stakeholders where the IDP is to be updated. It is important that an updated IDP is prepared which accurately reflects an up-to-date position with regards to the requirement for new school provision in consultation with the County Council in order that developers are provided with the clarity required to deliver the infrastructure needed to meet with both the District's and County's (as well as other statutory bodies where relevant) requirements as well ensuring that local needs are met. It is imperative that requirements remain consistent across all plan policies in relation to the delivery of infrastructure and provide an accurate and informed evidence base. The delivery of growth and associated infrastructure can only occur if proposals have been properly assessed for viability. Further work is needed on the evidence base particularly in regard to the issue of health and education provision and in relation to viability testing of potential infrastructure.	No changes required.	Infrastructure Funding Statement will be published annually as required by national guidance. The Infrastructure Delivery Plan is a 'living' document which will be updated to take account of the latest information where appropriate. Local Plan 2040 includes policies which seek to ensure appropriate infrastructure is delivered alongside development.
LP2040 654	David Pickford (Pegasus) - on behalf of Daniel Wright	INF2	Yes	Yes	No	N/A	No	It is important that the delivery of infrastructure is based on up-to date evidence. It is important that the wording of the policy is revisited to include reference to 'up to date evidence base' as well as referring specifically to any identified 'needs of the local community' (which may be reflected through Neighbourhood Plans, for example).	No changes required.	Infrastructure Funding Statement will be published annually as required by national guidance. The Infrastructure Delivery Plan is a 'living' document which will be updated to take account of the latest information where appropriate. Local Plan 2040 includes policies which seek to ensure appropriate infrastructure is delivered alongside development.
LP2040 655	David Pickford (Pegasus) - on behalf of Daniel Wright	SP7/INF4	Yes	Yes	No	N/A	No	There is an emphasis within SP7 to meet the need of the local community supported in line with the provisions the importance of development providing green infrastructure, open space and playing pitches where appropriate in line with up-to-date evidence but also through meeting identified local need, whether this is reflected through Neighbourhood Plans or other consultation with the local community/local evidence.	No changes required.	Local Plan is supported by up to date evidence in respect of open spaces and playing pitches.
LP2040 656	David Pickford (Pegasus) - on behalf of Daniel Wright	INF5	Yes	Yes	No	N/A	No	Broadly support INF5, it is important that any open space provision requirements are based on an up to date Open Space Assessment, along with any other specifically identified local needs/shortfalls, as set out within Neighbourhood Plans for example, as well as enable the opportunity for an independent Open Space Assessment to be undertaken where there isn't an up to date Open Space Assessment available.	No changes required.	Local Plan is supported by up to date evidence in respect of open spaces and playing pitches.
LP2040 657	David Pickford (Pegasus) - on behalf of Daniel Wright	SP10	Yes	Yes	No	N/A	No	The approach to sustainable development set out in Policy SP10 is generally supported where it is consistent with national policy. It is considered that reference to protecting the character and distinctiveness of settlements places the potential to restrict future development and plans too great a policy hurdle for development. It would introduce the same level of protection to all settlements as locations which are in Conservation Areas. Noted that the District's Air Quality Action Plan 2019 (AQAP) forms part of the Local Plan evidence base and outlines the action which will be taken in order to improve air quality within the District. One of a list of Area Action Plan Measures, includes the use of the planning regime to minimise impact of new developments on AQMAs, including the preparation of an Air Quality SPG to be completed by the end of 2019. This forms the latest document available in relation to air quality despite the AQAP setting out that an AQAP Steering Group will ensure regular review of the AQA, with the AQAP to be maintained as a "live" strategy. The Proposed Publication appears to make no reference to AQAP which should be reviewed to ensure sufficient evidence and clarity in the measures needed and requirements on landowners/developers in bringing forward larger strategic and other housing developments.	No changes required.	Support noted.
LP2040 658	David Pickford (Pegasus) - on behalf of Daniel Wright	SD1	Yes	Yes	No	N/A	No	The approach to securing high quality design as set out in Policy SD1 is generally supported however it should be updated to reflect the Government's priorities for well-designed places set out through the National Design Guide and recent updates to the NPPF. Reference instead to enhancing "accessibility and usability" would perhaps be more appropriate in guiding the decision-making process. As set out at paragraph 7.14 of the explanatory text it is important that the policy provides clear expectations for designing high quality development. Previous Preferred Options Plan set a requirement for Masterplans to be prepared alongside strategic developments of over 100 dwellings, which was supported. Policy SD1 however provides less clarity for developers with no explanation of when the preparation of a Masterplan would be considered appropriate. It is important that the policy is able to provide clearer thresholds in relation to the preparation of masterplans and design briefs/design codes.	No changes required.	National Design Guide and National Design Code published after Local Plan 2040 prepared. Not considered a soundness issue.
LP2040 659	David Pickford (Pegasus) - on behalf of Daniel Wright	SP11	Yes	Yes	No	N/A	No	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 be amended to comply with national policy. When referring to the inappropriate construction of new buildings in the Green Belt and the exceptions to this rule, the policy includes specific reference to the provision of affordable housing on small rural exception sites. This however should be reworded to ensure it is consistent with the provisions of the NPPF. The NPPF (2021) at Paragraph 149 however allows for greater flexibility with regards to the delivery of affordable housing which is not restricted to the provision of affordable housing on rural exception sites, setting out that "limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites)".	No changes required.	Consider policy relating to Green Belt to be consistent with national planning policy.
LP2040 660	David Pickford (Pegasus) - on behalf of Daniel Wright	SP12	Yes	Yes	No	N/A	No	There has been a reduction in Lichfield's Local Housing Need by 220 dwellings in addition to a significant reduction in the Districts contribution towards the Greater Birmingham and Black Country Housing Market Area (GBBCHM) housing shortfall, with this contribution reducing from 4,500 (as identified within the Preferred Options Local Plan) to 2,665 within the current Proposed Publication document, a reduction of 1,835 dwelling. There is no clear justification set out within the supporting explanatory text for the significant drop in dwelling numbers since the previous iteration of the plan. It is considered that Policy SP12 should be updated, with housing delivery figures reverting back to the approach taken at the Preferred Options stage. SP12 needs to provide greater flexibility to accommodate potential increased housing numbers both through the Duty to Cooperate and sites not coming forward in a timely manner. 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.	No changes required.	Local Plan 2040 proposes to provide 2665 dwellings to meet unmet needs from the GBBCHMA with 2000 towards the shortfall arising from the Black Country. This is in addition to unmet need provided in the adopted local plan. The 2020 Position Statement identifies that the unmet need arising from the Black Country will emerging from 2027/28. Explanatory text within the plan sets out that the stepped approach is based upon local evidence of delivery and the 2020 Position Statement. Evidence on recent delivery suggests there has been a significant increase, however when compared over the plan period as a whole the average delivery is lower.  District Council will prepare statements of common ground with those partners. In respect of the 35% uplift to Local Housing Need of cities this applies only to those authorities and guidance states this should not be met outside of the city authorities.

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LP2040 661	David Pickford (Pegasus) - on behalf of Daniel Wright	H1	Yes	Yes	No	N/A	No	Concerned that Policy H1, lacks sufficient flexibility to meet changing housing needs across the district and across the plan period by virtue of its reference to specific percentage figures. It is submitted that the most appropriate approach to housing mix is to continue to be guided by market signals, as defined within the most up-to-date Strategic Housing Market Assessment (SHMA) and Employment Development Needs Assessment (HEDNA). The SHMA and HEDNA should be routinely updated across the plan period which will ensure that housing mix is reflective of market need. Evidence is currently however very high-level and it is not clear from the HEDNA how the housing mix has been established using detailed local evidence in accordance with guidance set out in the National Planning Policy Guidance (NPPG). In seeking to specify a mix, the policy currently 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. The Policy also identifies that the final housing mix can be considered against four 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.	No changes required.	<a href="#">Policy H1 is based upon up to date evidence within the HEDNA which details the housing mix required to meet the District's housing need based upon demographics. The policy provides flexibility within each type/size of house to ensure the policy is flexible.</a>
LP2040 662	David Pickford (Pegasus) - on behalf of Daniel Wright	H2	Yes	Yes	No	N/A	No	It is noted that since the Preferred Options iteration of the plan, policy provisions in relation to affordable housing have been amended to reflect specific affordable housing percentage threshold requirements depending on the nature of development which is supported. This has been based on the findings of the Local Plan and CIL Viability Assessment (September 2020) which identifies the figure of 500 units as an appropriate quantum of development to differentiate between the level of affordable housing required on strategic and non-strategic greenfield sites (paragraph 8.24). However, it is noted that this viability assessment has been based on assumptions and a high-level assessment of the potential viability of these sites. The 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 Strategic Housing Market Assessment (SHMA) and Housing and Employment Needs Assessment (HEDNA).  Given the need to deliver much needed affordable housing delivery requirement there should also be provisions made within Policy H2 which allows greater weight in favour of granting planning permission for those developments which meet identified local need and/or deliver levels of affordable housing over and beyond plan policy requirement.	No changes required.	<a href="#">Affordable housing policy within the Local Plan 2040 seeks to achieve the maximum viable level of affordable homes through development. This is supported by the Council's evidence base including viability work.</a>
LP2040 663	David Pickford (Pegasus) - on behalf of Daniel Wright	Chapter 10 - Natural Resources	Yes	Yes	No	N/A	No	The approach to habitats and biodiversity is generally supported where it is consistent with national policy. SP15, Policy NR2 and Policy NR4 continue to include the biodiversity net gain requirement. The supporting text clarifies this will be assessed through Natural England's biodiversity matrix. To ensure consistency with requirements at a national level, policy wording should be amended to include reference to the Biodiversity Metric 3.0 published in July 2021 which significantly updates and improves the earlier metric in line with the biodiversity net gain requirements set out in the Environment Bill.	No changes required.	<a href="#">Support noted.</a>
LP2040 664	David Pickford (Pegasus) - on behalf of Daniel Wright	NR1	Yes	Yes	No	N/A	No	Consider currently written the policy could pose restrictions for delivering much needed housing within villages and the wider rural area in line with the Plan's overall vision and growth strategy, and in particular Strategic Objectives 1 and 2.	No changes required.	<a href="#">Policy within the Local Plan 2040 provides clear guidance as to when development in rural areas will be supported.</a>
LP2040 665	David Pickford (Pegasus) - on behalf of Daniel Wright	SP9	Yes	Yes	No	N/A	No	Policy SP9 is supported in the interests of conserving the natural environment, however it is important that the specific wording of the policy is in accordance with the provisions of national guidance.	No changes required.	<a href="#">Support noted.</a>
LP2040 666	David Pickford (Pegasus) - on behalf of Daniel Wright	SP16	Yes	Yes	No	N/A	No	Support the revised wording of the policy removing reference to the Green Belt.	No changes required.	<a href="#">Support noted.</a>
LP2040 667	David Pickford (Pegasus) - on behalf of Daniel Wright	SSV1	Yes	Yes	No	N/A	No	The principle of supporting small scale development in all of the District's rural settlements, which meets local needs, is welcomed. It is also accepted that the need should be evidenced, although it shouldn't just be for the local community to evidence such a need, particularly given that housing growth is likely to be facilitated by private developers. The wording should therefore be amended so that rather than being evidenced by the local community, should be evidenced with the involvement of the local community. With no allocations identified in these rural locations and with overly restrictive policies requiring development within tightly drawn settlement boundaries with little to no capacity for any infill development, and with restrictive affordable housing policies inconsistent with national planning policy.	No changes required.	<a href="#">Policy within the Local Plan 2040 provides clear guidance as to when development in rural areas will be supported.</a>
LP2040 668	David Pickford (Pegasus) - on behalf of Daniel Wright	Whole document/Sustainability appraisal	Yes	Yes	No	N/A	No	The SA considers reasonable alternatives sites however there are a number of inconsistencies and errors which have been identified within the SA. Some of these include inaccurate reference to safeguarded land at Burntwood, Lichfield and Fazeley at paragraph 2.4.7 and inaccuracies in relation to the settlement hierarchy including identifying Little Aston as a Smaller Service Village / Smaller Rural Village instead of a Larger Service Village. These should be rectified as part of any further analysis undertaken by Lichfield District Council.	No changes required.	<a href="#">Local Plan 2040 has been supported by evidence including Sustainability Appraisal at all stages of plan progression. Lichfield District Council considers the Sustainability Appraisal to have been prepared in accordance with relevant regulations and guidance.</a>
LP2040 669	Kathryn Ventham (Barton Willmore) for IM Land	Vision	Yes	Yes	No	Yes	Yes	Support the vision in principle. Consider that LDC should include specific wording about the creation of much needed housing to meet the needs of both the district and the wider housing market area given the requirements of NPPF paragraph 11d.  LDC should swap the reference to the villages and the largest settlements around to reflect the spatial strategy which seeks to provide a large proportion of housing within Lichfield (including the SUE at North East Lichfield). The reference to 2040 should also be amended given the references in the plan to growth potentially extending beyond 2040 (taking into account NPPF paragraph 22).	No changes required.	<a href="#">Support noted.</a>
LP2040 670	Kathryn Ventham (Barton Willmore) for IM Land	Strategic Objectives	Yes	Yes	No	Yes	Yes	Supports Strategic Objective 1 where it identifies North East Lichfield as a SUE.  Strategic objective 6 (meeting housing need) is not worded positively in term of supporting new housing to meet the needs of both the district and the wider housing market area. This therefore fails to fully reflect the economic objective within NPPF paragraph 8.	No changes required.	<a href="#">Support noted.</a>
LP2040 671	Kathryn Ventham (Barton Willmore) for IM Land	SP1	Yes	Yes	No	Yes	Yes	Strongly support the proposed spatial strategy, which will direct growth to the most sustainable locations and to sites which have been assessed as the most suitable by LDC's housing site selection process (Housing Site Selection Paper 2019) and as part of the Sustainability Appraisal.  Note that Lichfield City (including Streethay) has been assessed as the most sustainable settlement within the Settlement Sustainability Study (September 2020). The strategy is positively prepared, justified, effective and consistent with national policy in accordance with NPPF paragraph 35. We also support the reference to a 'minimum' number of homes being provided given this could facilitate that increased housing number is feasible through good design.  We note that LDC have used 'Land north-east of Lichfield strategic housing allocation' within the policy (and the accompanying explanatory text, but 'north of Lichfield' elsewhere. This should be regularised to avoid confusion. Further, as set out within strategic the strategic objectives, LDC should refer to North East Lichfield as a SUE.  The policy refers to safeguarding. We support this but, as set out below, there is the requirement to safeguard land at Hilliards Cross for junction improvements to meet the wider aims of the draft plan. This should therefore be included within the policy and associated policies map(s). The evidence base should also set out why this is required to ensure the policy is justified.  We consider that the reference to 'contributing to community-well being' is not clearly written and unambiguous for the decision-maker. We consider that this whole paragraph can be removed from the policy.	No changes required.	<a href="#">Support noted.</a>

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LP2040 672	Kathryn Venham (Barton Willmore) for IM Land	SP12	Yes	Yes	No	Yes	Yes	<p>Barton Willmore have produced a housing needs report that concludes that for LDCs local need, the use of the standard method minimum may not truly reflect the housing need required to support economic growth aspirations or provide for the identified affordable housing need. With regards to the wider GBBCHMA housing need we have calculated the shortfall in unmet need to be a minimum of 21,950 dwellings 2031-2040. This, plus the local housing need, may justify an increase in housing by LDC. We consider that the site at North East Lichfield may be able to provide dwellings in excess of the 3,300 set out within the draft local plan through the detailed design process and optimisation of the Site in terms of density taking into account NPPF chapter 11.</p> <p>LDC should explicitly confirm what the windfall allowance they are accommodating is and should include this within the figure being planned for. It currently does not appear to be included within the 9,727 dwelling figure which I s only made up of completions/commitments/allocations. It is also not clear if this allowance includes the potential 500 homes that will be provided by the future Burntwood Area Action Plan.</p> <p>We consider that LDC should explicitly set out the rationale behind the reduction in provision to the GBBCHMA, and why this is the maximum which should be accommodated. This should take into account the 35% uplift requirement as set out within the NPPG.</p> <p>The requirement to plan ahead further than 15 years has been introduced after LDC have produced the Draft Plan. They will, however, have to take this requirement into account given the stage and the transitional arrangements.</p> <p>More dwellings will likely be delivered within the plan period on the SHA1 site than assumed within the draft plan. The SPD approach, which can build up on the extensive technical evidence base already compiled by the consultant team to justify the concept plan, can facilitate this delivery.</p>	No changes required.	<p>Housing requirement within the Local Plan 2040 provides for the Local Housing Need (LHN) as established by the Standard Methodology and supported by evidence within the HEDNA.</p> <p>Local Plan 2040 proposes to provide 2665 dwellings to meet unmet needs from the GBBCHMA with 2000 towards the shortfall arising from the Black Country. This is in addition to unmet need provided in the adopted local plan. The 2020 Position Statement identifies that the unmet need arising from the Black Country will emerging from 2027/28. Local Plan 2040 proposes four strategic allocations and includes a significant number of smaller 'saved' allocations from the current local plan which will continue to deliver significant homes to meet the housing requirement to 2040. In respect of the 35% uplift to Local Housing Need of cities this applies only to those authorities and guidance states this should not be met outside of the city authorities.</p>
LP2040 673	Kathryn Venham (Barton Willmore) for IM Land	Site Selection Paper	Yes	Yes	No	Yes	Yes	<p>It is noted that the housing need figure set out in paragraph 6.1 is incorrect. Paragraph 1.7 also refers to the 4,500 wider need figure from the previous iteration of the Draft Plan.</p> <p>A 10 dwelling threshold has been applied in this instance. We consider this is acceptable and note that sites below 10 dwellings are not included. We support LDC's decision to assess a large number of sites which make it through the initial sift within the SA. This will ensure there are reasonable alternatives assessed.</p> <p>The risk of flooding to the Site (Site ID 32) overall is low and that any areas of moderate or high risk can be mitigated against in line with national and local policies. The score should be amended to green. Evidence submitted shows the agricultural land classification should be amended to amber. Mitigation requirements for harm to heritage should be set out within the applicable policy (SHA1 and SHA1 concept statement). Submitted evidence shows the scores for landscape and biodiversity should be amended to green.</p>	No changes required.	Support noted.
LP2040 674	Kathryn Venham (Barton Willmore) for IM Land	SHA1	Yes	Yes	No	Yes	Yes	<p>An overriding comment would be that there is an element of duplication by the different policies and concept statements. These could be condensed to ensure the draft plan is clearly written and unambiguous.</p> <p>Detailed proposed rewording of policy SHA1 within table 6 of the representation document.</p>	No changes required.	Comment noted.
LP2040 675	Kathryn Venham (Barton Willmore) for IM Land	SHA1 Concept Statement	Yes	Yes	No	Yes	Yes	<p>Our overriding comment would be that there is an element of duplication with the specific SHA1 policy, and within the requirements of the concept statement. LDC should consider condensing the requirements to ensure the draft plan is as accessible as possible. An SPD approach will mean that the below concept statement may be superseded by the emerging SPD. This should be made clear within the text.</p> <p>Detailed proposed rewording of policy SHA1 within table 6 of the representation document.</p>	No changes required.	Comments noted, revisions to be reviewed and considered in relation to Policy SHA1 Concept Statement
LP2040 676	Kathryn Venham (Barton Willmore) for IM Land	Infrastructure Delivery Plan	Yes	Yes	No	Yes	Yes	<p>North East Lichfield is demonstrable as being fully viable and deliverable for the purpose of allocation within the draft local plan. There needs to be clarity within the draft plan (specifically policy SHA1) setting out whether it is required to pay CIL and what this CIL is to be used for. Further, the IDP (and policy SHA1) need to make clear that appropriate credits will be given for additional land given over to infrastructure taking into LDC's CIL payment in kind policies.</p> <p>Various amendments to the IDP are suggested within Table 8 of the representation document relating to education, highways, drainage, air quality, natural resources, community facilities and green spaces in relation to SHA1.</p>	No changes required.	Comment noted. Noted that site is viable and deliverable.
LP2040 677	Kathryn Venham (Barton Willmore) for IM Land	SP2	Yes	Yes	No	No	Yes	<p>Support the requirement to reduce the need to travel and consider that the allocation of a SUE in a sustainable location will contribute towards this. Consider this policy is justified, consistent with national policy and therefore sound.</p>	No changes required.	Support for Policy SP2 is noted.
LP2040 678	Kathryn Venham (Barton Willmore) for IM Land	SP3	Yes	Yes	No	Yes	Yes	<p>Support the requirement to provide EV charging points in either an active or passive format. This accords with NPPF paragraph 112 which sets out that development should be designed to enable charging of plug-in vehicles. The opportunity for passive provision allows for developments to be future-proofed. We note that this requirement is not included within LDC's evidence base and this should therefore be added in to ensure the policy is justified.</p>	No changes required.	Support for Policy SP3 and the provision of EV charging points is noted.
LP2040 679	Kathryn Venham (Barton Willmore) for IM Land	SP4	Yes	Yes	No	Yes	Yes	<p>Strategic Policy SP4 seeks to safeguard land required for road and junction improvements required to facilitate the local plan objectives. This includes the A38T junction at Hilliards Cross. Upgrades to Hilliards Cross are required to support all proposals in the draft plan, regardless of the proposed development at North East Lichfield and, as such, a strategic approach should be taken to upgrades at this junction with contributions being made by all developments/draft allocations with an impact. We therefore support the decision to safeguard land at this location.</p> <p>In order to ensure the policy is justified and unambiguous we consider that the policy and policies map should be made more specific setting out what land is required to be safeguarded. Our highways evidence sets out potential options for an upgraded junction and this information should be taken into account.</p>	No changes required.	Support noted for Policy SP4, evidence is emerging with coordination.
LP2040 680	Kathryn Venham (Barton Willmore) for IM Land	SP5	Yes	Yes	No	Yes	Yes	<p>The first paragraph should be amended to ensure LDC clearly set out they will work with other stakeholders (such as landowners, developers and promoters) to ensure the policy is effective and justified and consistent with NPPF paragraph 16c.</p> <p>The fifth paragraph should also specifically reference viability considerations explicitly to ensure consistency with NPPF paragraph 58. It should also include reference for the need to forward fund and collect contributions from all relevant developments in a fair and proportionate way in line with NPPF paragraph 8a, 11a and 57. An amendment is required to the policy to make it clear that only infrastructure requirements directly related to the development are required.</p> <p>Proposed rewording is suggested at Paragraph 7.10 of the representation document.</p>	No changes required.	Comment noted. Noted that site is viable and deliverable.
LP2040 681	Kathryn Venham (Barton Willmore) for IM Land	SP6	Yes	Yes	No	Yes	Yes	<p>Support the principle of this policy and that innovative methods will be supported. However, to ensure flexibility we would suggest a minor change to ensure it is not seen as a closed list and is consistent with NPPF paragraph 134b which promotes innovation and high levels of sustainability.</p> <p>Proposed rewording is suggested at Paragraph 7.11 of the representation document.</p>	No changes required.	Support for policy is noted, considered that policy is consistent with NPPF Paragraph 134b.
LP2040 682	Kathryn Venham (Barton Willmore) for IM Land	SP8	Yes	Yes	No	Yes	Yes	<p>Consider that the reference to funding mitigation measures should be expanded to refer to the fact that they may be adopted.</p>	No changes required.	No changes required.

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LP2040 683	Kathryn Ventham (Barton Willmore) for IM Land	SP10	Yes	Yes	No	Yes	Yes	Consider that the policy should provide flexibility to ensure that innovative methods can be used. This is especially important when considering the plan period and that new policies may emerge.  Consider that a further bullet point should be added referencing optimising the use of land to ensure consistency with NPPF paragraph 125 which seeks to ensure that developments make optimal use of the potential of each site to ensure that the needs of housing are met. This will ensure that the number of dwellings are maximised (noting that North East Lichfield could provide more dwellings) which will minimise the release of green belt land in accordance with NPPF paragraph 141.	No changes required.	Considered that policy as drafted is clear and appropriate.
LP2040 684	Kathryn Ventham (Barton Willmore) for IM Land	SP14	Yes	Yes	No	Yes	Yes	Strategic Policy 14 sets out that that retail, leisure, office and cultural facilities will be focused within Lichfield city centre and the commercial centre of Burntwood. The hierarchy of centres then sets out that Lichfield city (including Streethay) is the strategic centre. Given this includes Streethay, LDC should clarify that this also includes North East Lichfield	No changes required.	Considered at present this would not include north east Lichfield site - however this may be reconsidered within future local plan reviews.
LP2040 685	Kathryn Ventham (Barton Willmore) for IM Land	SP17	Yes	Yes	No	Yes	Yes	Strategic Policy 17 seeks to protect and improve the built environment. In order to ensure that the policy is consistent with Section 16 of the NPPF, we would suggest a number of amendments.  NPPF paragraph 189 states that heritage assets should be conserved in a manner appropriate to their significance. Further, NPPF paragraph 203 is clear that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. The original wording proposed is not consistent with the above. There is also no requirement for proposals to seek to enhance a designated heritage asset of its setting wherever possible within the NPPF.  Suggested amendments at Paragraph 7.18 of the representation document are proposed to make the policy sound. This takes into account heritage evidence produced by Barton Willmore.	No changes required.	Considered that current policy wording to be compliant with NPPF paragraphs concerning heritage.
LP2040 686	Kathryn Ventham (Barton Willmore) for IM Land	INF1	Yes	Yes	No	Yes	Yes	Consider that this policy largely duplicates policy requirements elsewhere (for example SP5) and therefore they could be combined to ensure brevity. Comments from Barton Willmore relating to Policy SP5 are relevant here. To ensure it is justified, the IDP will need to be accompanied by a proportionate evidence base. We note that this is not yet complete.  Given an SPD is being proposed for North East Lichfield, an amendment is suggested at Paragraph 7.20 of the representation document to clarify that the concept statements may be overtaken by the SPD.	No changes required.	No changes required.
LP2040 687	Kathryn Ventham (Barton Willmore) for IM Land	INF5	Yes	Yes	No	Yes	Yes	With regards to the allotment requirement, as set out above we consider that innovative solutions and provisions should be supported. This should include facilities such as community gardens/orchards which are more inclusive and foster community spirit.  The requirement for allotments appears to be based on the need within Lichfield City, and that those requiring a plot wish to take on a 150sqm plot that is not subdivided. We consider that this evidence is therefore floored given the dwellings provided within North East Lichfield will not be directly comparable to the urban area of Lichfield City. It also does not take into account that a number of these plots are split, which would reduce the amount required. LDC should therefore re-visit this evidence to provide an updated standard and ensure the policy is justified. There should also be an allowance for more innovative forms of food production to come forward.  LDC should confirm within the draft plan that North East Lichfield will not be required to pay further sums via contributions with CIL being utilised to meet any further community infrastructure funding requirements.	No changes required.	Open Space Assessment demonstrates the need for provision of allotments.
LP2040 688	Kathryn Ventham (Barton Willmore) for IM Land	SD1	Yes	Yes	No	Yes	Yes	We consider that the information within this policy largely duplicates information elsewhere and it could be deleted for the sake of brevity. Notwithstanding this, this policy should be revisited given the updated NPPF provides additional information relating to design and design codes. It should also recognise the fact that an SPD will be created for North East Lichfield and that there is a specific policy/concept statement governing this Site. This be set out within the explanatory text.  Viability evidence held at Appendix 16 of these representations sets out some further information in relation to the evidence behind the policy and its justification.	No changes required.	Consider policy in current form to be appropriate. National Design Guide and National Design Code published after Local Plan 2040 prepared. Not considered a soundness issue.
LP2040 689	Kathryn Ventham (Barton Willmore) for IM Land	SD2	Yes	Yes	No	Yes	Yes	We support the flexible approach taken by LDC, which makes allowance for the fact that district heating may not be feasible, subject to suitable evidence being provided to justify the policy.  The policy should be revisited given the updated NPPF (Section 14). Specifically, NPPF paragraph 154b states that any local requirements for sustainability of buildings should reflect the Government's policy for national technical standards. Any update to this should also be incorporated into LDC's viability testing to ensure consistency with NPPF paragraph 34.	No changes required.	Note support for policy and considers that policy as written is in conformity with NPPF.
LP2040 690	Kathryn Ventham (Barton Willmore) for IM Land	H1	Yes	Yes	No		Yes	Support in principle the requirement to provide a range of housing. Given the scale of SHA1 development, allowance should be made that a new neighbourhood will be created. This means that the housing mix requirements will be specific to this new development and the policy should therefore make an allowance for this within the explanatory text. There may be provision of other types of housing such as Build to Rent or housing for older people and the SPD could include allowance for this if required. The housing mix required is taken from the latest Housing and Economic Development Needs Assessment (HEDNA) (2020). Consider that wording should be added setting out development broadly in accordance with the most recent HEDNA will be acceptable. Further, the requirement for evidence should be and/or, dependant on the circumstances. With regards to density, consider that this should be amended to reflect the fact that higher and lower densities may be appropriate but that a designed approach should be utilised.	No changes required.	Considers policy in current form to be appropriate
LP2040 691	Kathryn Ventham (Barton Willmore) for IM Land	H2	Yes	Yes	No		Yes	Recommend that LDC considers inserting additional wording to confirm the starting position in terms of affordable housing tenure mix that represents compliance with the policy. This should then be tested within LDCs evidence base to ensure the policy is justified. Further, LDC may wish to clarify the approach to First Homes, and ensure an allowance for this is included within the evidence base. Policy also refers to the delivery of affordable housing on phased sites. Consider that the policy should specifically identify circumstances where affordable housing may be reduced on one phase and secured later via review mechanisms (for example if large scale infrastructure contributions are required earlier in the schedule). LDC may wish to include wording to this effect within the policy or explanatory text (taking into account NPPG paragraph: 009 Reference ID: 10-009-20190509 and NPPF paragraph 58) to ensure consistency with national policy. Given that there are still emerging evidence bases in terms of infrastructure, such as highways for example, it is difficult ascertain the impact of this on viability and therefore AH provision.	No changes required.	Considers policy in current form to be appropriate
LP2040 692	Kathryn Ventham (Barton Willmore) for IM Land	NR2	Yes	Yes	No	Yes	Yes	Local policy NR2 seeks to conserve or enhance biodiversity or geodiversity and deliver a net gain for such objectives. We support the principle of this policy but suggest amendments to ensure that the requirements are clear, the potential for mitigation is taken into account, and the policy is consistent with NPPF paragraphs 179 and 180.  Note that this is covered by policy NR5 (Cannock Chase Special Area of Conservation) and therefore there is an element of overlap.	No changes required.	Support for policy is noted.
LP2040 693	Kathryn Ventham (Barton Willmore) for IM Land	NR3	Yes	Yes	No	Yes	Yes	The requirement that applications, where appropriate, must include details of tree protection should be amended to clarify that this may be provided by condition. Further, reference should be made to Natural England's standing advice. We note that the Trees Landscaping and Development SPD (2016) is out of date in terms of buffers to ancient woodland.	No changes required.	Supplementary planning guidance sets out the requirement.
LP2040 694	Kathryn Ventham (Barton Willmore) for IM Land	LC1	Yes	Yes	No	Yes	Yes	Undertaken an assessment of the proposed North of Lichfield Strategic Gap and consider that this policy is not required given there will be permanent and physical separation from Fradley and therefore no gap policy is needed. There is also a requirement within the policies specifically governing North East Lichfield to ensure that this boundary is taken into account. As such we consider that the policy is not justified and should be removed. The designation should also be removed from the policies map.	No changes required.	Evidence has led to the changes to the plan including the Strategic Gap policy. Deletion of policy is not considered appropriate.



Representation Ref (LP2040 X).	Consultee/Agent	Section	Duty to Cooperate	Legally and procedurally Compliant?	Is the plan sound? (inclusive of positively prepared, justified, effective and compliance with NPPF)	Does the respondent suggest changes	Does the respondent wish to appear at EIP	Comment Summary	Changes Required	Officer Response
LP2040 695	Kathryn Ventham (Barton Willmore) for IM Land	Sustainability Appraisal	Yes	Yes	No		Yes	The SA is not considered deficient and provides a comprehensive discussion around the likely effects of policy and site options as evidence supporting the draft plan as a reasonable strategy. Notwithstanding this, the review suggests some areas which could be revisited to ensure robustness, such as the provision of a non-technical summary. The review also assessed the Site against the SA's objectives, and the scores given, as well as providing updated scores based on the latest evidence. We broadly agree with LDC in terms of scoring. Consider that the SA and assessments have been carried out in accordance with the requirements of the NPPF.	No changes required.	Local Plan 2040 has been supported by evidence including Sustainability Appraisal at all stages of plan progression. Lichfield District Council considers the Sustainability Appraisal to have been prepared in accordance with relevant regulations and guidance.
LP2040 696	Kathryn Ventham (Barton Willmore) for IM Land	Whole Document - Sustainability Appraisal	Yes	Yes	No	No	Yes	The SA is not considered deficient and provides a comprehensive discussion around the likely effects of policy and site options as evidence supporting the draft plan as a reasonable strategy. Notwithstanding this, the review suggests some areas which could be revisited to ensure robustness, such as the provision of a non-technical summary. The review also assessed the Site against the SA's objectives, and the scores given, as well as providing updated scores based on the latest evidence. We broadly agree with LDC in terms of scoring. Consider that the SA and assessments have been carried out in accordance with the requirements of the NPPF.	No changes required.	Local Plan 2040 has been supported by evidence including Sustainability Appraisal at all stages of plan progression. Lichfield District Council considers the Sustainability Appraisal to have been prepared in accordance with relevant regulations and guidance.
LP2040 697	Kathryn Ventham (Barton Willmore) for IM Land	Chapter 3 - Themes, issues, vision and objectives	Yes	Yes	No	No	Yes	Consider Vision provides a positive framework for the objectives and spatial strategy and is generally aligned with the sustainable development objectives set out in NPPF paragraph 8. Would advise that LDC should include specific wording about the creation of much needed housing to meet the needs of both the district and the wider housing market area given the requirements of NPPF paragraph 11d. LDC should swap the reference to the villages and the largest settlements around to reflect the spatial strategy which seeks to provide a large proportion of housing within Lichfield. With regards to the strategic objectives support objective 1. Strategic objective 6 (meeting housing need) is not worded positively in term of supporting new housing to meet the needs of both the district and the wider housing market area. This therefore fails to fully reflect the economic objective within NPPF paragraph 8	No changes required.	Support noted.
LP2040 698	Kathryn Ventham (Barton Willmore) for IM Land	SP1	Yes	Yes	No	No	Yes	Strongly support the proposed spatial strategy, which will direct growth to the most sustainable locations and to sites which have been assessed as the most suitable by LDC's housing site selection process (Housing Site Selection Paper 2019) and as part of the Sustainability Appraisal. Note that LDC have used 'Land north-east of Lichfield strategic housing allocation' within the policy (and the accompanying explanatory text, but 'north of Lichfield' elsewhere. This should be regularised to avoid confusion. Further, as set out within strategic the strategic objectives, LDC should refer to North East Lichfield as a SUE. The policy refers to safeguarding. We support this but, as set out below, there is the requirement to safeguard land at Hilliards Cross for junction improvements to meet the wider aims of the draft plan. This should therefore be included within the policy and associated policies map(s). The evidence base should also set out why this is required to ensure the policy is justified. Consider that the reference to 'contributing to community-well-being' is not clearly written and unambiguous for the decision-maker. We consider that this whole paragraph can be removed from the policy.	No changes required.	Support noted.
LP2040 699	Kathryn Ventham (Barton Willmore) for IM Land	SP12	Yes	Yes	No	No	Yes	Consider that for LDCs local need the use of the standard method minimum may not truly reflect the housing need required to support economic growth aspirations or provide for the identified affordable housing need. With regards to the wider GBBCHMA housing need we have calculated the shortfall in unmet need to be a minimum of 21,950 dwellings 2031-2040. This, plus the local housing need, may justify an increase in housing need. LDC should explicitly confirm what the windfall allowance they are accommodating is and should include this within the figure being planned for. It currently does not appear to be included within the 9,727 dwelling figure which is only made up of completions/commitments/allocations. LDC should also confirm how this windfall is made up. The preferred options consultation (November 2019) set out that a contribution of 4,500 dwellings would be made to the GBBCHMA. This has been reduced to 2,665 in the current version of the Draft Plan. LDC should explicitly set out the rationale behind this reduction in provision, and why this is the maximum which should be accommodated. This should take into account the 35% uplift requirement as set out within the NPPG. Furthermore, LDC should clarify plan on enabling sufficient development within these level 4/5 settlements and whether this is required to meet the housing targets	No changes required.	Local Plan 2040 proposes to provide 2665 dwellings to meet unmet needs from the GBBCHMA with 2000 towards the shortfall arising from the Black Country. This is in addition to unmet need provided in the adopted local plan. The 2020 Position Statement identifies that the unmet need arising from the Black Country will emerging from 2027/28. Explanatory text within the plan sets out that the stepped approach is based upon local evidence of delivery and the 2020 Position Statement. Evidence on recent delivery suggests there has been a significant increase, however when compared over the plan period as a whole the average delivery is lower.  District Council will prepare statements of common ground with those partners. In respect of the 35% uplift to Local Housing Need of cities this applies only to those authorities and guidance states this should not be met outside of the city authorities.
LP2040 700	Kathryn Ventham (Barton Willmore) for IM Land	SHA1	Yes	Yes	No	Yes	Yes	Consider scoring of the site within site selection paper should be amended to green for floor risk, biodiversity and landscape character and amber with regards to agricultural land classification. Evidence submitted as part of representation (heritage appraisal and archaeological assessment) concluding that development is likely to result in less than substantial harm to the setting of the identified heritage assets, that this can be minimised to by mitigation so that that the heritage constraints identified within this assessment do not preclude the Site for allocation within the draft plan. Support the overarching principle of SHA1 and concept statement, proposed changes to wording etc. referenced in table 6 and 7 of the submission document. Support the creation of an SPD to ensure a holistic development comes forward. However, suggest amendments may be required to avoid ambiguity and to ensure the plan is consistent with national policy including NPPF paragraph 73c. Also support the requirement for a concept masterplan within an SPD.	No changes required.	Site Selection paper published in 2019 in support of the Preferred Options document.
LP2040 701	Kathryn Ventham (Barton Willmore) for IM Land	SP2	Yes	Yes	No	No	Yes	Support policy with regards to SHA1 allocation	No changes required.	Support noted.
LP2040 702	Kathryn Ventham (Barton Willmore) for IM Land	SP3	Yes	Yes	No	No	Yes	Support policy however consider LDC needs to provide evidence base to support need for policy and viability implications	No changes required.	Local Plan 2040 is supported by viability evidence which has informed policy and requirements within the Local Plan.
LP2040 703	Kathryn Ventham (Barton Willmore) for IM Land	SP4	Yes	Yes	No	No	Yes	Support principle of policy however in order to ensure the policy is justified and unambiguous consider that the policy and policies map should be made more specific setting out what land is required to be safeguarded. Highways evidence sets out potential options for an upgraded junction and this information should be taken into account.	No changes required.	Local Plan 2040 is supported by viability evidence which has informed policy and requirements within the Local Plan.
LP2040 704	Kathryn Ventham (Barton Willmore) for IM Land	SP5	Yes	Yes	No	Yes	Yes	Consider that the first paragraph should be amended to ensure LDC clearly set out they will work with other stakeholders (such as landowners, developers and promoters) to ensure the policy is effective and justified and consistent with NPPF paragraph 16c. Policy should also have specific reference viability considerations explicitly to ensure consistency with NPPF paragraph 58.	No changes required.	Local Plan 2040 is supported by viability evidence which has informed policy and requirements within the Local Plan.
LP2040 705	Kathryn Ventham (Barton Willmore) for IM Land	SP6	Yes	Yes	No	No	Yes	Support policy - minor change to ensure it is not seen as a closed list and is consistent with NPPF paragraph 134b which promotes innovation and high levels of sustainability.	No changes required.	Support noted.
LP2040 706	Kathryn Ventham (Barton Willmore) for IM Land	SP8	Yes	Yes	No	No	Yes	Support - consider that the reference to funding mitigation measures should be expanded to refer to the fact that they may be adopted.	No changes required.	Support noted.



Representation Ref (LP2040 X).	Consultee/Agent	Section	Duty to Cooperate	Legally and procedurally Compliant?	Is the plan sound? (inclusive of positively prepared, justified, effective and compliance with NPPF)	Does the respondent suggest changes	Does the respondent wish to appear at EiP	Comment Summary	Changes Required	Officer Response
LP2040 707	Kathryn Ventham (Barton Willmore) for IM Land	SP10	Yes	Yes	No	No	Yes	Largely support - consider that a further bullet point should be added referencing optimising the use of land to ensure consistency with NPPF paragraph 125 which seeks to ensure that developments make optimal use of the potential of each site to ensure that the needs of housing are met. This will ensure that the number of dwellings are maximised (noting that North East Lichfield could provide more dwellings) which will minimise the release of green belt land in accordance with NPPF paragraph 141.	No changes required.	<a href="#">Note support</a>
LP2040 708	Kathryn Ventham (Barton Willmore) for IM Land	SP14	Yes	Yes	No	No	Yes	Clarification within settlement hierarchy as this includes Lichfield city (including Streethay) is the strategic centre - does this include north east Lichfield.	No changes required.	<a href="#">Settlement hierarchy identifies Lichfield City as the strategic centre, this includes proposed allocations adjacent to Lichfield City.</a>
LP2040 709	Kathryn Ventham (Barton Willmore) for IM Land	SP17	Yes	Yes	No	Yes	Yes	NPPF paragraph 189 states that heritage assets should be conserved in a manner appropriate to their significance. Further, NPPF paragraph 203 is clear that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. Consider that a full amendment to the policy (as detailed fully within representation) may be required.	No changes required.	<a href="#">Consider current policy wording to be compliant with NPPF</a>
LP2040 710	Kathryn Ventham (Barton Willmore) for IM Land	INF1	Yes	Yes	No	Yes	Yes	Consider that the first paragraph should be amended to ensure LDC clearly set out they will work with other stakeholders (such as landowners, developers and promoters) to ensure the policy is effective and justified and consistent with NPPF paragraph 16c. Policy should also have specific reference viability considerations explicitly to ensure consistency with NPPF paragraph 58.	No changes required.	<a href="#">Local Plan 2040 is supported by viability evidence which has informed policy and requirements within the Local Plan.</a>
LP2040 711	Kathryn Ventham (Barton Willmore) for IM Land	INF5	Yes	Yes	No	No	Yes	Do not support requirement for allotments appears to be based on the need within Lichfield City. Consider that this evidence is therefore floored given the dwellings provided within North East Lichfield will not be directly comparable to the urban area of Lichfield City. It also does not take into account that a number of these plots are split, which would reduce the amount required. LDC should therefore re-visit this evidence to provide an updated standard and ensure the policy is justified. There should also be an allowance for more innovative forms of food production to come forward. Viability evidence submitted sets out that LDC should clarify its intentions regarding a review of CIL charging and how this would affect North East Lichfield. LDC should confirm within the draft plan that North East Lichfield will not be required to pay further sums via contributions with CIL being utilised to meet any further community infrastructure funding requirements.	No changes required.	<a href="#">Open Space Assessment demonstrates the need for provision of allotments.</a>
LP2040 712	Kathryn Ventham (Barton Willmore) for IM Land	SD1	Yes	Yes	No	No	Yes	Consider that the information within this policy largely duplicates information elsewhere and it could be deleted for the sake of brevity. Policy should be revisited given the updated NPPF provides additional information relating to design and design codes. It should also recognise the fact that an SPD will be created for North East Lichfield and that there is a specific policy/concept statement governing SHA1 Site. This should be set out within the explanatory text.	No changes required.	<a href="#">Consider policy in current form to be appropriate</a>
LP2040 713	Kathryn Ventham (Barton Willmore) for IM Land	SD2	Yes	Yes	No	No	Yes	SHA1 North East Lichfield is included as a priority site for district heating. We support the flexible approach taken by LDC, which makes allowance for the fact that district heating may not be feasible, subject to suitable evidence being provided to justify the policy.	No changes required.	<a href="#">Support noted.</a>
LP2040 714	Kathryn Ventham (Barton Willmore) for IM Land	H1	Yes	Yes	No	No	Yes	Support in principle the requirement to provide a range of housing. Given the scale of SHA1 development, allowance should be made that a new neighbourhood will be created. This means that the housing mix requirements will be specific to this new development and the policy should therefore make an allowance for this within the explanatory text. There may be provision of other types of housing such as Build to Rent or housing for older people and the SPD could include allowance for this if required. The housing mix required is taken from the latest Housing and Economic Development Needs Assessment (HEDNA) (2020). Consider that wording should be added setting out development broadly in accordance with the most recent HEDNA will be acceptable. Further, the requirement for evidence should be and/or, dependant on the circumstances. With regards to density, consider that this should be amended to reflect the fact that higher and lower densities may be appropriate but that a design-led approach should be utilised.	No changes required.	<a href="#">Policy H1 is based upon up to date evidence within the HEDNA which details the housing mix required to meet the District's housing need based upon demographics. The policy provides flexibility within each type/size of house to ensure the policy is flexible.</a>
LP2040 715	Kathryn Ventham (Barton Willmore) for IM Land	H2	Yes	Yes	No	No	Yes	Recommend that LDC considers inserting additional wording to confirm the starting position in terms of affordable housing tenure mix that represents compliance with the policy. This should then be tested within LDCs evidence base to ensure the policy is justified. Further, LDC may wish to clarify the approach to First Homes, and ensure an allowance for this is included within the evidence base. Policy also refers to the delivery of affordable housing on phased sites. Consider that the policy should specifically identify circumstances where affordable housing may be reduced on one phase and secured later via review mechanisms (for example if large scale infrastructure contributions are required earlier in the schedule). LDC may wish to include wording to this effect within the policy or explanatory text (taking into account NPPG paragraph: 009 Reference ID: 10-009-20190509 and NPPF paragraph 58) to ensure consistency with national policy. Given that there are still emerging evidence bases in terms of infrastructure, such as highways for example, it is difficult ascertain the impact of this on viability and therefore AH provision.	No changes required.	<a href="#">Consider policy in current form to be appropriate</a>
LP2040 716	Kathryn Ventham (Barton Willmore) for IM Land	NR2	Yes	Yes	No	Yes	Yes	Support principle of policy however consider revisions may need to be made in order to be consistent with NPPF paragraphs 179 and 180.	No changes required.	<a href="#">Consider current policy wording to be compliant with NPPF</a>
LP2040 717	Kathryn Ventham (Barton Willmore) for IM Land	NR3	Yes	Yes	No	No	Yes	Reference should be made to Natural England's standing advice. We note that the Trees Landscaping and Development SPD (2016) is out of date in terms of buffers to ancient woodland.	No changes required.	<a href="#">Note comments - may need to consider updating SPD</a>
LP2040 718	Kathryn Ventham (Barton Willmore) for IM Land	LC1	Yes	Yes	No		Yes	An assessment of the proposed North of Lichfield Strategic Gap has been undertaken and consider that this policy is not required given there will be permanent and physical separation from Fradley and therefore no gap policy is needed. There is also a requirement within the policies specifically governing North East Lichfield to ensure that this boundary is taken into account. As such consider that the policy is not justified and should be removed. The designation should also be removed from the policies map.	No changes required.	<a href="#">Lichfield District Council considers it is appropriate to include policy in relation to the strategic gap in this location.</a>

Lichfield District Council  
Lichfield District Local Plan 2040  
Schedule of proposed modifications  
November 2021

## Key to schedule of modifications:

~~Text to be deleted~~ – strikethrough**Text to be added** – bold

Text to remain unmodified – plain text

*Explanatory text for modification – italics*

## Schedule of modifications to Local Plan 2040 document

Modification Number	Source of Modification	Page number	Proposed change	Reason
1	LDC	25	<i>Remove 'safeguarded land' from key to Figure 2.</i>	To correct error and remove the term safeguarded land from key. NB – safeguarded land shown on map.
2	LDC	77	<i>Correction of reference to Table 6 to Table 7.</i>	To correct error.
3	LDC	121-147 (inclusive)	<i>Renumber paragraph numbering from 15.X to 14.X.</i>	Correct formatting error in accessible pdf version.
4	LDC	127	<i>Remove 'MasterMap Lines' from key on Figure 4: Land west of Fazeley, Mile Oak &amp; Bonehill strategic housing allocation.</i>	Item not needed on key for figure 4.

Modification Number	Source of Modification	Page number	Proposed change	Reason																				
5	LDC	128	<p><i>Correction of road name in fourth bullet point under design sub-heading within Strategic policy SHA2:</i></p> <ul style="list-style-type: none"> <li>Proposals should seek to retain the hedgerow on Sutton <b>Road Lane</b>, to preserve the setting of the listed milepost and minimise visibility between the asset and the development site;</li> </ul>	To correct error.																				
6	LDC	128	<p><i>Correction of typographical error to remove repetition from first bullet point under the Infrastructure sub-heading within Strategic policy SHA2:</i></p> <p>Provision for access to and improvement of the strategic and local highway network and infrastructure as appropriate <del>provision for access to the strategic and local highway network as appropriate;</del></p>	To correct typographical error.																				
7	LDC	79	<p><i>Correction of typographical errors within dwelling mix table within Local policy H1: Achieving balanced housing market and optimising housing density to be consistent with Housing and Economic Development Needs Assessment document:</i></p> <table border="1"> <thead> <tr> <th>Type of home</th><th>1 bedroom</th><th>2 bedroom</th><th>3 bedroom</th><th>4+ bedroom</th></tr> </thead> <tbody> <tr> <td>Market homes</td><td>5-10%</td><td>30-35%</td><td><del>44-45%</del> <b>45-55%</b></td><td>5-15%</td></tr> <tr> <td>Affordable homes (ownership)</td><td>10-20%</td><td><del>35-40%</del> 40-45%</td><td>30-40%</td><td>5-15%</td></tr> <tr> <td>Affordable homes (rented)</td><td>20-30%</td><td>25-30%</td><td>35-40%</td><td>5-10%</td></tr> </tbody> </table>	Type of home	1 bedroom	2 bedroom	3 bedroom	4+ bedroom	Market homes	5-10%	30-35%	<del>44-45%</del> <b>45-55%</b>	5-15%	Affordable homes (ownership)	10-20%	<del>35-40%</del> 40-45%	30-40%	5-15%	Affordable homes (rented)	20-30%	25-30%	35-40%	5-10%	To correct typographical error within the table in the policy to ensure this is consistent with the evidence base recommendations.
Type of home	1 bedroom	2 bedroom	3 bedroom	4+ bedroom																				
Market homes	5-10%	30-35%	<del>44-45%</del> <b>45-55%</b>	5-15%																				
Affordable homes (ownership)	10-20%	<del>35-40%</del> 40-45%	30-40%	5-15%																				
Affordable homes (rented)	20-30%	25-30%	35-40%	5-10%																				

## Schedule of Modifications to Local Plan 2040 policies maps

Modification Number	Source of Modification	Page number	Proposed change	Reason
A	LDC	All maps	<i>Replace Lichfield District Council logo with new council logo.</i>	Up to date logo on all maps.
B	LDC	District map	<i>Amend key in relation to canal to ensure this correctly cross-references Strategic Policy 8.</i>	Correct cross reference to policy numbering.



## Lichfield District Local Plan 2040

Please return to Lichfield District Council by 5pm on 30<sup>th</sup> August 2021, by:

- Email: [developmentplans@lichfielddc.gov.uk](mailto:developmentplans@lichfielddc.gov.uk)
- Post: Spatial Policy and Delivery, Lichfield District Council, District Council House, Frog Lane, Lichfield, WS13 6YZ.

This form can also be completed on line using our consultation portal: <https://lichfielddc-consult.objective.co.uk/portal>

**PLEASE NOTE:** This form has two parts:

- Part A: Personal details.
- Part B: Your representation(s).

### Part A: Personal details

	1. Personal details <sup>1 2</sup>	2. Agent's details (if applicable)
Title		
First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)		
House No./Street		
Town		
Postcode		
Telephone number		
Email address (where relevant)		

<sup>1</sup> If an agent is being used only the title, name and organisation boxes are necessary but please don't forget to complete all the Agent's details.

<sup>2</sup> Please note that copies of all comments received will be made available for the public to view, including your address and therefore cannot be treated as confidential. Lichfield District Council will process your personal data in accordance with the Data Protection Act 1998. Our Privacy Notice is at the end of this form.

## Part B: Your representation

Where in the document does your comment relate:

	Section					
Document	Whole Document	Page Number	Paragraph Number	Policy Number	Appendix	Proposals Map
Lichfield District Local Plan 2040						
Sustainability Appraisal Report						
Other						

### Question 1

Do you consider that the Local Plan 2040 complies with the Duty to Co-operate?

Yes		No	
-----	--	----	--

Q1a Please specify the reasons below:<sup>3</sup>

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<sup>3</sup> Continue on a separate sheet/expand box if necessary. Mark any additional pages with your contact details

### Question 2

**Do you consider that the Local Plan 2040 meets the legal and procedural requirements?**

Yes		No	
-----	--	----	--

Q2a Please specify the reasons below<sup>4</sup>:

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### Question 3

**Do you consider that the Local Plan 2040 is positively prepared?**

Yes		No	
-----	--	----	--

Q3a Please specify the reasons below<sup>4</sup>:

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<sup>4</sup> Continue on a separate sheet/expand box if necessary. Mark any additional pages with your contact details

#### Question 4

**Do you consider that the Local Plan 2040 is justified?**

Yes		No	
-----	--	----	--

Q4a Please specify the reasons below<sup>5</sup>:

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#### Question 5

**Do you consider that the Local Plan 2040 is effective<sup>5</sup>?**

Yes		No	
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Q5a Please specify the reasons below:

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<sup>5</sup> Continue on a separate sheet/expand box if necessary. Mark any additional pages with your contact details

### Question 6

**Do you consider that the Local Plan 2040 is consistent with the National Planning Policy Framework?**

Yes		No	
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Q6a Please specify the reasons below<sup>6</sup>:

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**Question 7. Please set out what modification(s) you consider necessary to address your representations. You will need to say how this change will address the concerns and it would be helpful if you could put forward your suggested revised wording to any policy or text. Please be as precise as possible<sup>6</sup>.**

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Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues they identify for examination.**

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<sup>6</sup> Continue on a separate sheet/expand box if necessary. Mark any additional pages with your contact details



**Question 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

<b>No</b> , I do not wish to participate at the oral examination	
<b>Yes</b> , I wish to participate at the oral examination	

**Question 9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

--

**Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.**

<b>Signature<sup>7</sup>:</b>	
<b>Date:</b>	

**If you require this form in an alternative format please contact Spatial Policy and Delivery team on 01543 308192 or [developmentplans@lichfielddc.gov.uk](mailto:developmentplans@lichfielddc.gov.uk)**

Representation forms can be downloaded from the Council's website at [www.lichfielddc.gov.uk/localplan2040](http://www.lichfielddc.gov.uk/localplan2040). A paper copy can be provided by calling 01543 308192 or emailing [developmentplans@lichfielddc.gov.uk](mailto:developmentplans@lichfielddc.gov.uk)

All responses received by 5pm on 30<sup>th</sup> August 2021 will be considered, late responses will not be accepted under any circumstances. Individual acknowledgement of receipt will not be possible.

Please note that copies of all comments received and the names of who submitted them will be made available for the public to view and therefore cannot be treated as confidential. Lichfield District Council will process your personal data in accordance with the Data Protection Act 1998. Our Privacy Notice can be viewed at <https://www.lichfielddc.gov.uk/privacy> or contact us for a copy to be sent to you.

Representations may be accompanied by a request to be notified at a specified email address or postal address of the following:

- The submission of the Plan for independent examination under Section 20 of the Planning and Compulsory Purchase Act 2004.
- The publication of the recommendation of the person appointed to carry out the independent examination
- The adoption of the Plan.

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<sup>7</sup> Please sign the box if you are filling in a paper copy. The box can be left blank if you are filling in an electronic copy

Lichfield District Council ('the Council') will process your personal data in accordance with the Data Protection Act 1998 and (when in force) the General Data Protection Regulation ('GDPR').

We are required to provide certain information to you:

#### **Data Controller**

The Council is the Data Controller. Our address is Frog Lane, Lichfield, Staffs, WS13 6YY, telephone 01543 308000 and email [developmentplans@lichfielddc.gov.uk](mailto:developmentplans@lichfielddc.gov.uk)

We are represented by a Data Protection officer who can be contacted by emailing [dpo@lichfielddc.gov.uk](mailto:dpo@lichfielddc.gov.uk).

#### **Why do we process your information?**

To fulfil our statutory duty.

#### **What entitles us to process your personal information?**

Processing is necessary for the performance of a task (general development management) carried out in the public interest or in the exercise of official authority vested in the Council.

#### **Who might see your personal data (recipients)?**

We may share your information with officers of the Council employed to work in other service areas.

#### **How long do we store your data for?**

It is impossible to state a definite retention period. The Council will have received and recorded your personal data for a particular purpose(s). When the Council no longer needs your data for these purposes it will either be destroyed or deleted.

#### **Your rights**

- Access - you have a right to know if we are processing your data. We will tell you either way. If we are processing your data you have further rights such as to be provided with a copy of it.
- Rectification – if we are holding inaccurate information you can ask us to correct it.
- Erasure- in certain circumstances you can ask us to destroy or delete your information
- Restriction – in certain circumstances you can ask us to put a hold on the processing of your information
- Objection – again you can ask us to stop processing your personal data.

#### **Complaints**

If you are unhappy with the way we process your personal data then please speak to us in the first instance. Notwithstanding this you have the right to complain to the Information Commissioner. Their contact details can be accessed by clicking here: <https://ico.org.uk/>

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Lichfield Local Plan 2040  
Draft Submission Plan  
Regulation 22 (1) (c) Statement  
Statement of Consultation  
December 2021

DRAFT



*Lichfield*  
district council

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## 1. Introduction

- 1.1 This Statement has been prepared to support the submission of the Lichfield Local Plan 2040, in accordance with Regulation 22 (1) (C) of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Statement is a statutory requirement for a Local Planning Authority in the process of submitting a Local Plan to the Secretary of State. It outlines how the Council has complied with government requirements, in line with Regulations 18 and 19.
- 1.2 Regulation 22 requires a statement setting out:
- (i) which bodies and persons the local planning authority invited to make representations under regulation 18,*
  - (ii) how those bodies and persons were invited to make representations under regulation 18,*
  - (iii) a summary of the main issues raised by the representations made pursuant to regulation 18,*
  - (iv) how any representations made pursuant to regulation 18 have been taken into account;*
  - (v) if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations; and*
  - (vi) if no representations were made in regulation 20, that no such representations were made;*
- 1.3 The statement sets out how Lichfield District Council (the Council) has involved the community and stakeholders in preparing the Draft Submission Plan and how this meets the requirements set out in the Council's Statement of Community Involvement (2020) and national Regulations.
- 1.4 The report provides information on the following:
- An overview of the Council's engagement activities, across all individuals, groups and stakeholders during each stage of the Local Plan making process, including which bodies and persons were invited to make representations under regulation 18 and 19.
  - Which engagement activities were used during each stage of the Local Plan making process (both informal and formal).
  - How individuals, groups and stakeholders were invited to make representations to inform the Local Plan process.
  - A summary of the main issues raised by representations received through the engagement activities.
  - How those main issues have been addressed in the local plan
- 1.5 Table 1 shows the different stages of plan preparation leading up to the publication of the Draft Submission Plan.

Table 1: Local Plan Consultation Stages

Date	Consultation Stage
April 2018	Scope, Issues and Options (Reg 18)
January 2019	Preferred Options and Policy Directions (Reg 18)
November 2019	Preferred Options (Reg 18)
July 2021	Publication (Reg 19)

## 2. Consultation Methodology

- 2.1 The Council is committed to involving stakeholders and the local community in the development of Lichfield's Draft Local Plan. It has adopted an approach that views consultation as an on-going activity that is integral to the plan making process. The Council has used a range of methods to engage and consult with stakeholders and the local community, in accordance with the [Statement of Community Involvement](#) 2019 and the revised version adopted in September 2020 published in light of the Coronavirus (Covid-19) pandemic.
- 2.2 The Council has a comprehensive consultation database of consultees, and other stakeholders including residents associations, parish councils, elected representatives, community and voluntary groups, developers and businesses, infrastructure providers, government agencies and individuals.
- 2.3 Cross boundary consultation has been carried out with adjoining local authorities and parish councils.
- 2.4 Persons or organisations wishing to be included on the Council's Local Plan consultation database can sign up via the Council's website and are able update their details. Stakeholders and the local community have been informed by email or in writing of opportunities to get involved in plan making, and given a variety of options for responding, including in writing, email and using the on line consultation portal.
- 2.5 A range of different approaches has been undertaken, including the following methods:
  - Stakeholder meetings and briefings
  - Seminars and presentations
  - Conferences and workshops
  - Drop in sessions
  - Exhibitions at libraries
  - Emails/ letters to those on the Council's consultation database
  - Leaflets and posters
  - Press releases, media interviews and newspaper articles
  - FAQ document
  - A dedicated phone line to members of the planning policy team
  - Online video clip to explain how to comment on the plan
- 2.6 The following chapters set out the consultations undertaken at each stage of plan preparation and further details on the consultation processes are set out in within the appendices of this statement.

### 3. Scope, Issues and Options Consultation – April 2018

- 3.1 This initial stage of the Local Plan review commenced in April 2018 and involved setting out the broad scope of the Local Plan Review and sought views on a number of topics such as:
- the period that the Local Plan Review should cover
  - the evidence base to be prepared
  - cross boundary and strategic issues that will need to be addressed
  - the key challenges that the District faces
  - the level of growth that should be provided for
  - the opportunities that exist to accommodate this growth.
- 3.2 The Scope Issues and Options document identified the key challenges the District faces and posed a series of questions throughout the document. A number of broad possible options to deliver both housing and employment growth were included within the document to seek stakeholder's views.
- 3.3 Consultation on the Scope, Issues and Options took place over a six week period between April and June 2018. As part of the consultation letters and emails were sent to all stakeholders on the Local Plan consultation database, including Duty to Cooperate partners and Parish Councils. Meetings with residents groups, stakeholders and private sector organisations were held. An executive summary document was produced and a duty officer was available during office hours. Documents were made available in local libraries and Council offices and manned exhibitions were held at various locations across the District.
- 3.4 Publicity included use of corporate social media, press release, press adverts and emails to Parish Council clerks ahead of the consultation period offering a presentation.
- 3.5 In total 1,637 responses were received from 260 individual consultees to the Scope, Issues and Options consultation.
- 3.6 The main issues raised from representations and the Councils response to these are detailed in Table 2 below:

Table 2: Preferred Options and Policy Directions Consultation responses

Summary of main issues raised	Summary of analysis
The review should provide explicit consideration of the needs arising from the Greater Birmingham Housing Market Area (GBHMA) and this should be reflected throughout the vision, objectives and strategic priorities.	The Review does acknowledge the needs arising from the GBHMA. The needs of neighbouring authorities warrant reference within the Plan. However further consideration needs to be given as to whether this needs to be explicitly set out within the vision, objectives and strategic priorities.
There needs to be greater emphasis on economic growth and the needs associated with employment.	Economic growth is considered to be a fundamental component of the plan review process. In drafting the next stage of the review consideration will be given to ensure appropriate focus is provided to economic growth.

Summary of main issues raised	Summary of analysis
There is a clear requirement to release Green Belt land in order to meet future growth needs.	The Council will undertake a Green Belt review which will assist in determining Green Belt release (if required).
Some of the proposed locations for growth are in unsustainable locations, growth should be focused in and around the existing built up area.	This scale and distribution of growth and the implications for areas of the district and specific sites will be addressed as part of the consideration of options for a suitable spatial strategy.
The existing urban areas are at capacity which triggers the needs to focus growth in other areas of the District.	This scale and distribution of growth and the implications for areas of the district and specific sites will be addressed as part of the consideration of options for a suitable spatial strategy.
The needs associated with housing requires a more thorough analysis. In particular there should be greater reference to self-build/ custom build and housing for the elderly.	These additional areas warrant further consideration and will be considered as the Review is progressed. It is noted that a number of respondents suggested that a policy requiring self-build is not appropriate.
There are infrastructure deficits across much of the District.	Infrastructure is a challenging matter which is best addressed through a Local Plan rather than piecemeal planning applications. The Infrastructure Delivery Plan (IDP) will be the primary mechanism for identifying infrastructure needs. The evidence base being developed will assist in informing this work. In addition involvement of key stakeholders such as Staffordshire County Council will assist in developing the IDP.
Some respondents considered the plan period to be appropriate, others considered there to be a need to align with the other GBHMA Authorities.	This will need to be considered, however it is agreed that there is logic in aligning the Plan period with other Local Plan Authorities conducting Plan Reviews.
There is limited justification to include a density policy.	It is recognised that there needs to be flexibility within a Plan regarding density. Notwithstanding this it is important the District achieves suitable density delivery. This is something that is common across the GBHMA, arising from the GL Hearn and Wood Strategic Growth study.
Residents from Shenstone/ Stonnall and Little Aston made a significant amount of generic objections opposing growth in this area. This is	From a planning policy perspective the number of respondents should not be a reason to halt progress with considering areas for growth.

Summary of main issues raised	Summary of analysis
comparatively higher than other areas across the District.	Growth in this area will need to be tested in line with the other options.

#### 4. Preferred Options and Policy Directions Consultation – January 2019

- 4.1 Following consideration of representations on the Draft Local Plan work continued on the Draft Local Plan. This involved commissioning of evidence, development of the Plan vision and spatial strategy and consideration of options for site allocations.
- 4.2 Following consideration of representations on the Scope Issues and Options and publication of the Summary of Representations in January 2019, work commenced on the Draft Local Plan. Work to update the evidence base supported the Draft Local Plan was undertaken and resulted in updated evidence in relation to Duty to Cooperate, Habitat Regulations Screening Assessment, Settlement Hierarchy Assessment, Land Availability Assessment by way of an active call for sites process and Sustainability Appraisal.
- 4.3 The above evidence combined with the previous consultation responses and changes to national planning policy informed this stage of the consultation document.
- 4.4 The Preferred Options and Policy Directions document where possible set out the preferred policies that are being suggested. These policies were based on the concluded evidence and/or the consultation responses. Where more work was required a preferred policy direction was identified.
- 4.5 The January 2019 document included a preferred settlement hierarchy, based upon evidence available at that point in time. This identified a broadly similar hierarchy to that set out within the currently adopted local plan.
- 4.6 Consultation on the Preferred Options and Policy Directions document took place over a seven week period between January and March 2019. As part of the consultation letters and emails were sent to all stakeholders on the Local Plan consultation database, including Duty to Cooperate partners and Parish Councils. Meetings with residents groups, stakeholders and private sector organisations were held. An executive summary document was produced and a duty officer was available during office hours. Documents were made available in local libraries and Council offices and manned exhibitions were held at various locations across the District.
- 4.7 Publicity included use of corporate social media, press release, press adverts and emails to Parish Council clerks ahead of the consultation period.
- 4.8 In total 5,045 responses were received from 1,630 individual consultees the Scope, Issues and Options consultation. Of the 1,630 responses 1,230 were from Burntwood Action Group in relation to the proposed settlement hierarchy.



4.9 The main issues raised from representations and the Councils response to these are detailed in Table 3 below:

Table 3: Preferred Options and Policy Directions Consultation responses

Summary of main issues raised	Summary of analysis
The vision provides no commitment to protect the Green Belt or an approach of favouring non green belt locations in advance of Green Belt. This is not consistent with the NPPF.	The vision provides a broad overarching statement at district wide level. The evidence base is being updated and will include a comprehensive Green Belt Review having regard to national policy. Green Belt policy is currently addressed in Chapter 17 of the POPD.
The vision should confirm a commitment to meeting a proportion of the unmet housing need from the wider HMA and be updated to acknowledge the requirement for release of green field Green Belt land to plan positively for the level of growth needed.	The vision provides a broad overarching statement at district wide level. Chapter 14 considers housing requirements and the evidence base is being updated and will include a HEDNA which has regard to meeting unmet need and a comprehensive Green Belt Review. LDC is working with other authorities in the wider Housing Market Area through the duty to cooperate.
The Local Plan Growth proposals for Shenstone, Stonnall and Little Aston contradict the vision. Growth needs from the wider HMA are not justified and housing needs are not comprehensively assessed. Housing pressures are not identified.	The vision provides a broad overarching statement at district wide level. The evidence base is being updated and LDC is working with other authorities in the wider Housing Market Area through the duty to cooperate in meeting housing needs identified through the Strategic Growth Study.
Strategic objectives should include commitment to meeting housing needs across the wider HMA of Birmingham and the Black Country.	Strategic objective 6 indicates housing need will be met for existing and new residents. The need for wider HMA unmet need to be met is a specific issue considered in Chapter 14 of the POPD. The evidence base is being updated and LDC is working with other authorities in the wider Housing Market Area through the Duty to Cooperate.
Assessment of Shenstone, Little Aston and Stonnall in the settlement hierarchy is flawed as services and facilities and station car parking considered deficient to support future development.	The settlement hierarchy in chapter 10 identifies Shenstone and Little Aston as level 3 centres and Stonnall as a level 4 settlement recognising their attributes (services +facilities) relative to other settlements within Lichfield District and neighbouring towns and settlements. A wide range of evidence base is being assembled to support the local plan review and to further refine the settlement hierarchy and spatial strategy.
The issues affecting Burntwood must not be understated, nor unrealistic reliance placed on urban capacity and upping densities. Green Belt releases are justified to provide the economic growth levels required to uplift Burntwood and its infrastructure	Specific sites will be considered as part of the local plan review. The evidence base is being updated and LDC is working with other authorities in the wider Housing Market Area through the duty to cooperate in preparing a comprehensive Green Belt review and in meeting housing needs. The evidence base being assembled will

Summary of main issues raised	Summary of analysis
as well as addressing the identified housing needs from the District and neighbouring authorities.	help to further refine the settlement hierarchy and spatial strategy.
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. The evidence base being assembled will help to further refine the settlement hierarchy and spatial strategy.
There are no 'exceptional circumstances' in which Burntwood's Green Belt could be justified for housing when suitable sites for new settlements outside the Green Belt have been put forward.	The Local Plan Review will be supported by an extensive evidence base including an updated HEDNA, SHLAA, Urban Capacity Assessment and a comprehensive Green Belt Review which will inform the next stages of the plan.
The preference for growth option 2 in the Sustainability Appraisal (SA) is questionable. It would almost certainly require the further release of Green Belt land, when a viable proposal for growth option 4 has been submitted. The SA process is imprecise and relies on assumptions and subjectivity and cannot be relied upon. It tries to justify the extension of Burntwood which is barely sustainable now.	A wide range of evidence is being assembled to support the review of the local plan. The SA process is iterative with the Local Plan Review and will be applied consistently as the plan evolves.
Neither the spatial strategy nor the settlement hierarchy should seek to preclude development from coming forward in level 5 settlements where development would contribute to the vitality and viability of rural communities.	The settlement hierarchy is informed by the settlement sustainability study. The evidence base being assembled will help to further refine the settlement hierarchy and inform the spatial strategy.
The document has not considered the reasonable option of smaller new settlements and has missed a key opportunity of growth in well-connected and sustainable new villages. In this regard, Lichfield District Council's approach is inconsistent with national policy by setting out a preferred strategy which most likely relies on Green Belt releases before all other options outside of the Green Belt have been considered.	A wide range of evidence is being assembled including a comprehensive Green Belt Review to support the review of the local plan and will help to further refine the settlement hierarchy and spatial strategy.
Fradley should be a higher tier settlement than level 3 due to its unique offer of significantly greater and unique scale of housing and employment opportunities. There should also be a distinction between rural settlements that lie within the Green Belt and those rural settlements that lie outside of	Fradley is identified as level 3 in the settlement hierarchy based on the settlement sustainability study. The evidence base being assembled including a Green Belt Review will help to further refine the settlement hierarchy and inform the spatial strategy.

Summary of main issues raised	Summary of analysis
the Green Belt. The plan does not take a sequential approach to Green Belt release in line with the NPPF.	
There are exceptional circumstances that warrant further release of Green Belt. Namely to allow for necessary proportionate growth which fits with a sustainable hierarchy and assists existing and proposed services.	The evidence base being assembled including a Green Belt Review will help to further refine the settlement hierarchy and inform the spatial strategy.
The Strategy should recognise that a site being brownfield land does not automatically render the site sustainable, it may be in an isolated location or there may be difficulty in delivery because of site contamination / constraints.	The Local Plan Review will be supported by an extensive evidence base including a SHLAA and Urban Capacity Assessment which will inform the next stages of the plan.
BREEAM sustainability assessment is not mandatory and should be left to discretion of the developer.	Comments in relation to BREEAM and preferences towards the proposed approach are noted.
The greatest sustainable transport potential for the growth options would come from electrification of the railway line to the north east of Lichfield. The reliability of the Cross-City line is also key to its use by commuters.	The consultation document sets out the preferred settlement hierarchy and growth option. Locations for growth will be considered as the local plan progresses.
The residential growth options approach in the POPD is inconsistent with approach of other Local authorities, e.g. South Staffs and Cannock Chase. A consistent approach would suggest the option of Local Housing Need plus minimum requirement of recommended areas of search in the Strategic Growth Study should also be tested. That is for the provision of 13,000 dwellings.	The Council have commissioned a HEDNA which will be prepared in accordance with national planning policy and practice guidance and test housing and employment growth scenarios. In addition further evidence base documents including an Urban Capacity Assessment will be prepared to inform the next stages of the Local Plan Review.
Housing mix should not be overly restricted and should be dependent on local circumstances, character, local need and the market signals.	The Local Plan Review will be supported by a range of evidence base studies including a HEDNA and plan wide viability assessment. This will inform the next stage of the review and help define policies relating to housing mix.
LDC should not impose a blanket density, but take into consideration local characteristics and site constraints.	The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. The Local Plan Review will be supported by a range of evidence base studies including a HEDNA and plan wide viability assessment. This will inform the next stage of the review and help define the policy approach relating to housing mix and housing density.
A blanket requirement for the provision of self-build plots on major development sites would not boost	This will be considered further as the Local Plan Review progresses. The Council maintains a self-build register in accordance with its legal requirements and monitors the

Summary of main issues raised	Summary of analysis
housing supply and could prove difficult in respect of delivery.	demand for self-build plots within the District. The Local Plan Review will be supported by a plan-wide viability assessment.
It is important that the new criteria identified in the consultation document in respect of the A5 and A38 corridors for Gypsies and travellers, does actually enable a more proactive approach to provision given past shortfall in delivery.	The Local Plan Review will be supported by a range of evidence including a Gypsy and traveller needs accommodation assessment which will inform the next stage of the plan process.
Drayton Manor Park should be recognised as major employer and key tourist attraction. Specific support should be given for the site's future development and flexibility to the policy restraint of Green Belt.	Specific sites will be considered as part of the Local Plan review. A comprehensive Green Belt review is proposed as the evidence base for the Local Plan review is assembled.
The creation of Sustainable Urban Extensions (SUEs) to settlements within Lichfield District will assist in providing green infrastructure, opportunities for the provision of indoor and outdoor sports and recreation facilities, support sustainable transport measures and contribute towards health care facilities, which will encourage healthy lifestyles and thereby assist in tackling obesity.	Noted – Specific sites will be considered as part of the local plan review.
Shenstone, Little Aston and Stonnall have several protected green spaces which are actively used within their Neighbourhood Plan. Greenfield amenity land adding to overall well-being should not be considered for housing.	Noted, the comments will be considered as part of the local plan review as the evidence base is assembled
Green Belt is not a natural resource but an artificial constraint and therefore should not be included within a policy on natural resources.	Noted, the comments will be considered as part of the local plan review as the evidence base is assembled
It is considered that a policy which seeks to impose a blanket protection for the countryside does not comply with national guidance. Landscape is only valued if it has physical attributes which take it out of the ordinary having regard to the Landscape Institute Guidelines.	Noted, the comments will be considered as part of the local plan review as the evidence base is assembled.
Masterplans are not justified with regard to small scale and medium scale schemes. Such initiatives add cost to the development process and make development less viable and reduce flexibility and slow down delivery.	Noted. Any impact upon viability / delivery will be tested through the Local Plan review process.
Neighbourhood Plans are mechanisms for the protection of a quality environment and open space	Not all areas have a Neighbourhood Plan. Neighbourhood Plans are required to be kept up to date as are Local

Summary of main issues raised	Summary of analysis
and for identifying appropriate housing need, density and housing mix. They should have a stronger role in any future Local plan. This should be a stated recommendation.	Plans and will continue to provide local opportunities for protection of the environment. A Neighbourhood Plan should support the delivery of strategic policies set out in the Local Plan.
Requirements for heritage statements should be in the validation policy not the Local Plan.	A heritage statement is currently a requirement of the local validation process.
The Plan should define what precisely the heritage assets are, where they are, their character and then relate policies to these elements in order to ensure explicit requirements to preserve and enhance them.	The Local Plan provides a strategic role within a suite of documents that will seek to preserve and enhance heritage assets.
Table 19.1 is principally based on potential constraints, however the scope for mitigation should not be ignored.	Mitigation will be considered in relation to specific sites considered as part of the Local Plan Review.
In Table 19.1, there is seemingly little regard for the consideration of transport and infrastructure matters that are critical to the deliverability of the broad options or the potential benefits that strategic growth can realise.	The Settlement Sustainability Study used to identify the settlement hierarchy had regard to access to services and facilities. A wide range of evidence is being assembled to support the review of the local plan and will help to further refine the settlement hierarchy and spatial strategy.
Green Belt purposes should be assessed at site level not broad parcels due to site specific factors.	A wide range of evidence is being assembled to support the review of the local plan including a Green Belt review. The Green Belt Review will be undertaken having regard to National policy and agreed principles through the duty to cooperate within the wider HMA.
Alternative options including a new settlement / large sites have dis-benefits including requiring significant investment in infrastructure, long lead in times and uncertainty over delivery.	Comments noted. Site specific proposals will be considered as part of the local plan review.
The Little Aston to Shenstone Green Belt strategic gap, is one of the most important in the Greater Birmingham area. The Council are not able to demonstrate exceptional circumstances exist to develop in the Green Belt when there are potentially large sustainable development areas outside the Green Belt north-east of Lichfield city and to the north of Tamworth.	Site specific proposals will be considered as part of the local plan review process. A wide range of evidence is being assembled including a comprehensive Green Belt review and HEDNA to support the review of the local plan and to further refine the settlement hierarchy and spatial strategy.



## 5. Preferred Options – January 2020

- 5.1 The Preferred Options version of the draft Local Plan provided additional detail based on newly updated evidence and responses received to the previous consultation of the Preferred Options & Policy Directions version held between January and March of 2019.
- 5.2 It proposed changing the plan period to 2040 to align better with evidence base time periods. It also included a revised approach to delivering a potentially achievable level of growth of approximately 11,780 new homes including a shortfall of 4,500 contribution towards the Greater Birmingham and Black Country housing Market Area and an additional buffer of housing sites of around 20% – 25 %. It sought to accommodate this growth whilst causing minimal impact on the Greenbelt. It therefore proposed changes when compared to the previous version of the emerging local plan in respect of how growth could be distributed across the district and its settlements. Most particularly, instead of proposing a distribution pattern allocating sites broadly in line with the settlement hierarchy, it sought to allocate a significant proportion of the growth through the release of land for development via:
- Growth north of Lichfield City
  - Growth of the sustainable villages of Fradley, Fazeley, Mile Oak & Bonehill and Whittington
  - Sustainable growth of Burntwood
  - Marginal growth of the rural settlements
- 5.3 The Preferred Options consultation took place between November 2019 and January 2020 for 8 weeks. As part of the consultation letters and emails were sent to all stakeholders on the Local Plan consultation database, including Duty to Cooperate partners and Parish Councils. Meetings with residents groups, stakeholders and private sector organisations were held and a duty officer was available during office hours. Documents were made available in local libraries and Council offices and manned exhibitions were held at various locations across the District.
- 5.4 Publicity included use of corporate social media, press release, press adverts and emails to Parish Council clerks ahead of the consultation period.
- 5.5 Representations were received from approximately 460 individuals or organisations with a further 685 individual members of the public submitting a standard response regarding proposals for Burntwood.
- 5.6 The main issues raised from representations and the Councils response to these are detailed in Table 4 below:

Table 4: Preferred Options and Policy Directions Consultation responses

Summary of main issues raised	Summary of analysis
<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"> <li>• 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;</li> <li>• 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 &amp; Delivery Team where exhibition materials and copies of all relevant documentation were available;</li> <li>• 'Un-manned' exhibition was set up in Burntwood Library and posters advertising the consultation were placed in Lichfield Library;</li> <li>• Consultation was advertised in the local press and online via the Council's website and social media platforms;</li> <li>• Members of the team were made available each day throughout the consultation for queries over the phone and in person at District Council House.</li> </ul>
<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 &amp; Policy Directions 2019). Such</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</p>

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 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.	Local Plan progresses and the additional evidence work is completed.
There is a lack of clarity/justification as to how the allocations and housing requirements for settlements have been arrived at.	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.
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.	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.
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.	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.
The Council should provide more homes to meet the unmet needs arising from within the wider housing	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

market area and that the contribution within the preferred options document has not been justified.	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.
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"> <li>Existing infrastructure, in particular roads, health facilities and schools, will not be able to cope with the level of growth.</li> <li>Pressure will be on infrastructure within Tamworth Borough.</li> <li>The scale of the allocation (800 homes) when compared to the current size of the village and that such growth is disproportionate.</li> <li>No 'exceptional circumstances' to release Green Belt for development.</li> </ul>	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 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 to 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 are. Council should consider whether a higher	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



employment requirement is required considering the level of housing growth being proposed.	is explicitly referred to within the consultation document. All possible options will need to be considered as the local plan review progresses.
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## 6. Regulation 19 Consultation – July 2021

- 6.1 Following consideration of representations on the Preferred Options Consultation and publication of the Summary of Representations, work continued on the Draft Submission Plan.
- 6.2 The document included a number of Strategic Policies, including the levels of development to be delivered to 2040 (and sites to deliver these requirements), and a suite of 'Local Policies' which were principally focussed on development management issues relevant to the determination of planning applications.
- 6.3 In February 2021, Cabinet agreed to the publication of the Local Plan 2040 publication document and associated evidence base documents for the purposes of public consultation with dates for public consultation to be confirmed at a later date due to ongoing restrictions relating to Covid-19.
- 6.4 The Publication version consultation took place over eight weeks between July and August 2021 as Covid-19 restrictions were eased. The document provided additional detail based on updated evidence and responses received to the previous consultation version held between November 2019 and January 2020.
- 6.5 The Council produced and published a standard representation form, guidance on how to make representations including the use of the online consultation system and a frequently asked questions paper.
- 6.6 As part of the consultation letters and emails were sent to all stakeholders on the Local Plan consultation database, including Duty to Cooperate partners and Parish Councils. Meetings with stakeholders and private sector organisations were held. Virtual drop in sessions were offered to Parish Councils and resident groups. A Frequently Asked Questions document was produced and a duty officer was available during office hours. Documents were made available in local libraries and Council offices on request and Covid secure manned exhibitions were held at various locations across the District.
- 6.7 Publicity included use of corporate social media, press release, press adverts and an online video clip explaining how to comment on the plan.
- 6.8 The range of techniques used raised awareness of the consultation and the District Council consider the consultation process fully met the requirement of the SCI and is in accordance with the Town and Country Planning Regulations.
- 6.9 In total 718 responses were received from 213 individual consultees to the Local Plan 2040 Regulation 19 Consultation. [A summary of all of the representations received and the Council's summary responses can be seen on the following link.](#) [\(To be inserted following the decision of cabinet\)](#).
- 6.10 As a result of the consultation and comments received, a list of minor modifications to the plan have been identified which is to be submitted to [the Planning Inspectorate to](#) address factual corrections and any spelling and grammatical errors highlighted by the representations received to the Regulation 19 consultation. [The list can be viewed here:](#) [\(to be inserted following the decision of Cabinet\)](#)

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6.11 Cabinet decision to be added.

## 7. Conclusion

- 7.1 The Council has been committed to involving stakeholders and the local community in the development of the draft local plan. This is clearly demonstrated by the range and breadth of consultation and involvement since work commenced in 2018. Stakeholders and local communities have had the chance to influence the development of the Draft Submission Local Plan.
- 7.2 The Council is satisfied that it has complied with the requirements of Regulation 22(1)(c) of the Town and Country Planning (Local Development) (England) Regulations 2012 (as amended). It is also satisfied that it can demonstrate that consultation and involvement has been undertaken in accordance with the Council's Statement of Community Involvement.
- 7.3 The Council has used a comprehensive range of consultation techniques to keep stakeholders and the local community informed and involved. These have taken advantage of the opportunities presented by web based consultation in particular during the Covid-19 pandemic, as well as using traditional methods such as direct mailing, press releases and articles, exhibitions and drop in sessions.

## Appendices

### Appendix 1 – List of Specific and General Consultees

Specific Consultees	General Consultees
County Councils	Residents
All adjoining Local Authorities	Local Economic Partnerships covering the District, namely the Greater Birmingham and Solihull Local Economic Partnership and the Stoke-on-Trent and Staffordshire Economic Partnership
All Parish Councils within Lichfield District and those adjoining our boundaries	Voluntary bodies
Environment Agency	Bodies representing the interests of: -businesses within Lichfield District - various racial, ethnic or national groups -people with disabilities -young or older people -religious groups
Natural England	
Historic England	
Highways England	
Health and Safety Executive	
Homes and Communities Agency	
The Coal Authority	Developers, Agents and Landowners
Network Rail	Various schools
British Pipelines Agency	Transport providers
British Telecom/ EE/T-mobile/Three/Vodafone& O2	Charities
Civil Aviation Authority	Community groups including residents associations
Clinical Commissioning Group, NHS England	Housing bodies
Office of Rail Regulation	Sports bodies and groups
South Staffordshire Water Plc	Environmental bodies and groups
Staffordshire Police	Other specialist interest groups
Staffordshire Fire and Rescue Service	Design advice groups
Western Power Distribution	National Forest Company
Severn Trent Water Plc	Cannock Chase AONB Partnership
National Grid	Government Office for the West Midlands
Marine Management Organisation	Aggregate operators
	The Theatres Trust

## Appendix 2 - Letters and sample consultation material

Your ref LP2040Reg19  
Our ref DP1/  
Ask for Spatial Policy and Delivery  
Email [developmentplans@lichfielddc.gov.uk](mailto:developmentplans@lichfielddc.gov.uk)



District Council House, Frog Lane  
Lichfield, Staffordshire WS13 6YX

Direct Line 01543 308192  
Customer Services 01543 308000

5 July 2021

### Have your say: Lichfield District Local Plan 2040 Regulation 19 Consultation 5<sup>th</sup> July 2021 –30<sup>th</sup> August 2021

We are writing to you because you have previously made comments or asked to be kept updated about our planning policy consultations.

We would like to invite you to have your say on the new Local Plan 2040 listed below. The consultation period will last 8 weeks from Monday 5<sup>th</sup> July 2021 to 5pm Monday 30<sup>th</sup> August 2021.

#### Local Plan 2040: Final Draft – Regulation 19 Consultation

The Lichfield Local Plan 2040 sets out where new homes, workplaces and other developments should be built to meet the district's future needs, whilst protecting the quality of our unique historic, natural and built environment.

Following on from previous consultations held in November 2019, January 2019 and April 2018, we are consulting on the final draft version of the plan (known as the Regulation 19 version) before it is submitted to the Government for examination in public. This consultation is the final opportunity for you to comment on the plan's soundness and legal compliance.

The purpose of this consultation relates to receiving comments on:

- **Legal Compliance** – does the plan meet the legal requirements made under various statutes?
- **Soundness** – has the plan been positively prepared, justified, effective, and consistent with national policy?
- **Meets the Duty to Cooperate** – has the Council engaged and worked effectively with neighbouring authorities and statutory bodies?

Please note that comments made during the Regulation 19 consultation period will be passed to the appointed Planning Inspector for consideration as part of the examination in public. The use of the standard representation form is strongly recommended as this will ensure that all comments are related to matters relevant to the subsequent examination by a Planning Inspector. The representation form available online from the Council's website [www.lichfielddc.gov.uk/localplan2040](http://www.lichfielddc.gov.uk/localplan2040) or a paper copy can be provided by phoning 01545308192.

#### How to View the Local Plan 2040 Documents

The Local Plan 2040 documents will be available to view online at [www.lichfielddc.gov.uk/localplan2040](http://www.lichfielddc.gov.uk/localplan2040).

Hard copies of the Local Plan and associated documents will be available to view at the following locations throughout the consultation period:

- Friary Grange Leisure Centre
- Burntwood Library, Sankeys Corner, Bridge Cross Road, Burntwood, WS7 2BX



- Burntwood Leisure Centre

The document will also be made available in hard copy at the Lichfield District Council House in a Covid secure manner, on request. Subject to Covid restrictions lifting, the plan will be available at the District Council House between 9am and 5pm.

#### Drop in Sessions

We will be holding drop in sessions in Lichfield and Burntwood where members of the planning team will be available to talk to you. Further information on when and how these will be held in a Covid secure way will be made available online at [www.lichfielddc.gov.uk/localplan2040](https://www.lichfielddc.gov.uk/localplan2040) or by calling 01543 308192. The potential for further drop in sessions will be kept under review subject to Covid restrictions and updated information on these will be provided at the link above.

If you would prefer to discuss matters by telephone our planning officers are available to help clarify any queries you may have before submitting written comments. Planning officers are available during working hours Monday – Friday by calling 01543 308192.

#### How to Comment on the Local Plan 2040

There are a number of ways to submit your comments:

- Online via the consultation portal: <https://lichfielddc-consult.objective.co.uk/portal>.
- Email: [developmentplans@lichfielddc.gov.uk](mailto:developmentplans@lichfielddc.gov.uk)
- In writing to: Spatial Policy & Delivery, Lichfield District Council, Frog Lane, Lichfield, WS13 6YZ.

Where possible we encourage you to submit comments online but if you are unable to comment using the online system, a representation form is available to download from the website at [www.lichfielddc.gov.uk/localplan2040](https://www.lichfielddc.gov.uk/localplan2040). This can be completed and sent via email to [developmentplans@lichfielddc.gov.uk](mailto:developmentplans@lichfielddc.gov.uk) or sent by post to Spatial Policy & Delivery, Lichfield District Council, Frog Lane, Lichfield, WS13 6YZ.

We will consider all responses received by 5pm on 30 August 2021. Late responses will not be accepted under any circumstances and individual acknowledgement of receipt will not be possible.

#### Your Personal Details

It is important that the Planning Inspector and all participants in the examination process are able to know who has given feedback on the plan. Therefore, all comments received, including contact details, will be passed onto the Inspector. In addition, all comments will be made public on our website including the names of those who submitted them. All other personal information will remain confidential. For more information on how your data will be processed please see the enclosed [Privacy Notice](#).

You will be added to our database online at <https://lichfielddc-consult.objective.co.uk/portal> and may be contacted at future stages of the Local Plan process. If you do not wish to be contacted further please advise us.

Yours faithfully

Stephen Stray  
**Spatial Policy and Delivery Manager**  
 Economic Growth

## Planning Policy Privacy Notice

### Data Controller

Lichfield District Council of the District Council House, Frog Lane, Lichfield Staffs WS13 (telephone number 01543 308000) is the 'controller' of your personal data.

### Data Protection Officer

Our 'Data Protection Officer' is Lorraine Fowkes and she can be contacted by email at [dpo@lichfielddc.gov.uk](mailto:dpo@lichfielddc.gov.uk).

### Purpose of processing

As an organisation the council is required to prepare development plans (local plan or neighbourhood plan) and we process (collect retain and use) your personal data to enable us to perform those statutory functions. This includes registering you as a consultee so that the council can receive and consider your views on our local plan consultations. We also process your information to enable us to let you know about any future consultations.

### Legal basis

Our legal basis for processing your personal data will be either that it is necessary to do so to perform a task carried out in the public interest or it is the exercise of official authority by us.

### Sharing your data

We will share your information with officers within the local plans team, members of the public and certain other organisations such as statutory and non-statutory consultees and the Planning Inspectorate to the extent required by law or to the extent necessary to allow the council to perform its function. We will make every effort to blank out personal information such as signatures, email addresses and telephone numbers on documents submitted to the spatial policy and delivery teams before your information is displayed on the council's website, but may publish names and addresses.

### Retention

We will store your information for as long as it is necessary for the purposes for which it is held.

### Your rights in brief

The General Data Protection Regulation (GDPR) gives rights to you about your personal data:

- Access - you have a right to know if we are processing your data. We will tell you either way. If we are processing your data you have further rights such as to be provided with a copy of it.
- Rectification – if we are holding inaccurate information you can ask us to correct it.
- Erasure- in certain circumstances you can ask us to destroy or delete your information
- Restriction – in certain circumstances you can ask us to put a hold on the processing of your information
- Objection – again you can ask us to stop processing your personal data.

We encourage those wishing to make representations and be kept informed of future consultations to use the online facilities available <https://lichfielddc-consult.objective.co.uk/portal>

If you have any concerns about how your data is processed or retained, please email our spatial policy and delivery manager at : [developmentplans@lichfielddc.gov.uk](mailto:developmentplans@lichfielddc.gov.uk) or by telephone 01543 308000 or Spatial Policy and Delivery, Economic Growth, Lichfield District Council, District Council House, Frog Lane, Lichfield, WS13 6YZ.

### Complaints

Please speak to a member of the local plans team or our Data Protection Officer in the first instance but if you still have concerns, then you can contact the Information Commissioner at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or by email at <https://ico.org.uk/concerns/>

Your ref  
Our ref DP1/LPR  
Ask for Spatial Policy and Delivery  
Email [Developmentplans@lichfielddc.gov.uk](mailto:Developmentplans@lichfielddc.gov.uk)



Direct Line 01543 308192  
Customer Services 01543 308000

29<sup>th</sup> November 2019

Dear Sir/Madam,

**Have your say: Lichfield District Planning Policy Consultations**

We are writing to you because you have previously made comments or asked to be kept updated about our planning policy consultations.

We would like to invite you to have your say on the new Local Plan Review listed below. The consultation period spans 8 weeks from the 29<sup>th</sup> of November 2019 to the 24<sup>th</sup> of January 2020.

**Local Plan Review: Preferred Options 2018 - 2040: 29 November 2019 – 24 January 2020**

The Lichfield Local Plan is a district wide plan which provides a clear framework to guide and promote development as well as protect the quality of our unique historic, natural and built environment.

Following the Local Plan Review: Preferred Options & Policy Directions of January 2019, we are consulting on the next stage of the local plan review process the preferred options and policy directions.

For each consultation, the consultation documents will be available to view online at [www.lichfielddc.gov.uk/planningpolicy](http://www.lichfielddc.gov.uk/planningpolicy). The relevant documents will also be available to view in the reception of the District Council House, Frog Lane, Lichfield, WS13 6YZ during office hours.

For the Local Plan Review: Preferred Options consultation we will be holding some drop in sessions at locations and details of these will be advertised as soon as they have been finalised. Look for details on our website, the local newspaper or on local noticeboards.

5<sup>th</sup> December 2019: Fradley Village Hall, 1:30pm – 5:30pm  
9<sup>th</sup> December 2019: Fazeley Town Hall, 3:00pm – 6:00pm  
10<sup>th</sup> December 2019: Armitage Village Hall, 3:00pm – 6:00pm  
11<sup>th</sup> December 2019: Shenstone Methodist Church, 3:00pm – 6:00pm  
16<sup>th</sup> December 2019: Burntwood Memorial Institute, 3:00pm – 6:30pm  
17<sup>th</sup> December 2019: Colton Village Hall, 1:00pm – 3:00pm  
18<sup>th</sup> December 2019: Thomas Spencer Hall, Whittington, 2:30pm – 5:30pm  
10<sup>th</sup> January 2020: Alrewas Village Hall, 4:00pm – 6:00pm  
16<sup>th</sup> January 2020: Lichfield Council Chamber 3:00pm – 6:00pm

Once the consultations are live, there are a number of ways for you to send us your comments:

- Online via the website: <http://lichfielddc-consult.limehouse.co.uk/portal>

- Email: [developmentplans@lichfielddc.gov.uk](mailto:developmentplans@lichfielddc.gov.uk)
- In writing to: Spatial Policy & Delivery, Lichfield District Council, Frog Lane, Lichfield, WS13 6YZ.

We will only be able to accept responses received by 5pm on the last day of the consultation and individual acknowledgement of receipts will not be possible.

Please note that copies of all comments received will be made available for the public to view, including your address and therefore cannot be treated as confidential. For more information on how your data will be processed please see the enclosed [Privacy Notice](#).

You will be added to our database online at <https://lichfielddc-consult.objective.co.uk/portal> and contacted at future stages in the preparation of the Local Plan. If you do not wish to be contacted further please advise us.

Yours faithfully

Ashley Baldwin  
**Spatial Policy and Delivery Manager**  
 Economic Growth



## **Local Plan Review – Privacy Notice**

### **Data Controller**

Lichfield District Council of the District Council House, Frog Lane, Lichfield Staffs WS13 (telephone number 01543 308000) is what is known as the 'controller' of your personal data.

### **Data Protection Officer**

Our 'Data Protection Officer' is currently Bal Nahal. She can be contacted at the address and via the number given above.

### **Purpose of processing**

As an organisation we process your personal data to enable us to register you as a consultee and to receive and consider your views on our local plan consultations. We also process your information to enable us to let you know about any future consultations.

### **Legal basis**

Our legal basis for processing your personal data will be either that it is necessary to do so to perform a task carried out in the public interest or it is the exercise of official authority by us.

### **Recipients**

We will share your information with officers within the local plans team. Your name and views will be made available to the public and possibly the Planning Inspectorate.

### **Retention**

We will store your information for up to 30 years.

### **Your rights -in brief**

If we process your personal data you may, depending on your circumstances have a right of access to it; to correct inaccurate information; to restrict our processing of it or to have your personal data erased. If you wish to exercise a right please contact the spatial policy and delivery team. The spatial policy and delivery team can be contacted via email: [developmentplans@lichfielddc.gov.uk](mailto:developmentplans@lichfielddc.gov.uk) or by telephone 01543 308000 or Spatial Policy and Delivery, Economic Growth, Lichfield District Council, District Council House, Frog Lane, Lichfield, WS13 6YZ.

### **Complaints**

Please speak to a member of the local plans team or our Data Protection Officer in the first instance but if you have any concerns about the way we have processed your personal information then you can contact the Information Commissioner. They can be contacted at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF <https://ico.org.uk/concerns/>



Public Notices



**ROAD TRAFFIC REGULATION ACT 1984 - SECTION 141(b)  
THE M42 MOTORWAY AND A5 TRUNK ROAD (DORDON TO WEEFORD)  
(TEMPORARY PROHIBITION OF TRAFFIC) ORDER 2021**

NOTICE IS HEREBY GIVEN that Highways England Company Limited (Company No. 9348363) has made an order on the M42 Motorway and the A5 Trunk Road, between Dordon and Weeford, in the Counties of Warwickshire and Staffordshire, to allow resurfacing, inspections and maintenance works to be carried out.

The effect of the Order will be to –

- (1) close, at different times, –
  - (a) the westbound carriageway of the A5 from its roundabout junction with Green Lane, Trinity Road and the slip roads leading to and from the M42 at Junction 10 (M42 Junction 10 Roundabout), at Dordon, to its junction with the entry slip road leading from the roundabout junction with the B5440 Marlborough Way, near Tamworth;
  - (b) the eastbound carriageway of the A5 from its junction with M42 Junction 10 Roundabout, to its junction with Danny Morson Way, at Dordon;
  - (c) the circulatory carriageway of M42 Junction 10 Roundabout;
  - (d) any slip road or link road leading to or from the A5 between its junction with M42 Junction 10 Roundabout and its roundabout junction with the A38, Roman Road and the M6 Toll slip roads at Weeford;
  - (e) any slip road leading to or from the M42 at Junction 10;
  - (f) the layby adjacent to the westbound carriageway of the A5 approximately 320 metres southeast of its junction with M42 Junction 10 Roundabout; and
  - (g) the layby adjacent to the eastbound carriageway of the A5 approximately 240 metres southeast of its junction with M42 Junction 10 Roundabout; and
- (2) prohibit any vehicle from entering or leaving M42 Junction 10 Roundabout at its junction with Trinity Road.

The work will be carried out overnight between 20:00 hours and 06:00 hours with some full daytime closures at weekends and is expected to start on Thursday 22 July 2021 and continue for approximately six weeks. The laybys are expected to be closed from 20:00 hours on Wednesday 21 July 2021, for twenty-four hours per day, for the duration of the works. The Order will come into force on 19 July 2021. Vehicles being used for police, fire and rescue authority or ambulance purposes, and vehicles being used in connection with the works will be exempt from the closures and prohibition.

Diversion routes via the B4116, Rowlands Way, Sheepy Road, the B5000 and the B5440 and vice versa, or via the M42, the A446 and the A38 and vice versa will be signed. Local diversions will also be in operation.

For further information please contact Ryan Davies on 07712 544 302.

**Karen Eastlake**, an officer in Highways England Company Limited, Highways England Company Limited (Company No. 9348363) registered office: Bridge House, Walnut Tree Close, Guilford, GU1 4LZ. A company registered in England and Wales.

**ROAD TRAFFIC REGULATION ACT 1984 - SECTION 141(b)  
THE M42 MOTORWAY (JUNCTION 9, CURDWORTH)  
(TEMPORARY PROHIBITION OF TRAFFIC) ORDER 2021**

NOTICE IS HEREBY GIVEN that Highways England Company Limited (Company No. 9348363) has made an order on the M42 Motorway, in the County of Warwickshire, to allow survey works to be carried out.

The effect of the Order will be to close the northbound carriageway of the M42 from its junction with the exit slip road at Junction 9, to its junction with the entry slip road at Junction 8.

The work will be carried out overnight between 21:00 hours and 06:00 hours and is expected to start on Monday 26 July 2021 and continue for 2 nights. The Order will come into force on 19 July 2021.

Vehicles being used for police, fire and rescue authority, ambulance or traffic officer purposes and vehicles being used in connection with the works will be exempt from the closure.

A diversion route via the M42 Junction 9 northbound exit and entry slip roads will be signed.

**Warwickshire County Council**

**ROAD TRAFFIC REGULATION ACT 1984**

Warwickshire County Council has made the following Temporary Traffic Orders:

**HARPERS LANE, MANCETTER**

**Order Effect:** Road closed to vehicular traffic westbound between the junctions of the A6 and central reservation.

**Reason for Order:** Carriageway white-lining and associated works, 09.30hrs-15.30hrs.

**Order Commences:** 19 July 2021 for up to 18 months.

**Anticipated Completion:** 19 July 2021.

**Access & Diversions:** Killing Bird, Mancetter Road, Happers Lane.

**Contractor:** Balfour Beatty, Tel: 03452 415 302.

**PUBLIC FOOTPATH A132 ANSLAY/MANCETTER**

**Order Effect:** Footpath closed to ALL traffic at GR 42974 29098.

**Reason for Order:** To avoid the likelihood of danger to the public because of a collapsed bridge along its route.

**Order Commences:** 16 July 2021 for up to 6 months.

**Contact:** WCC Rights of Way Team, Tel: 01926 412 909.

**Warwickshire County Council proposes to make the following Temporary Traffic Orders:**

**EDGE HILL AND TAMWORTH ROAD, WOOD END**

**Order Effect:** Road closed to vehicular traffic between the junctions of Trinity Road and Sharnock Close.

**Reason for Order:** Carriageway patching and associated works, 09.30hrs-15.30hrs.

**Order Commences:** 2 August 2021 for up to 18 months.

**Anticipated Completion:** 2 August 2021.

**Access & Diversions:** Trinity Road, A6, Gypsy Lane, Lower House Lane, Boulton Lane, Tamworth Road and vice versa.

**Contractor:** Balfour Beatty, Tel: 03452 415 302.

**HOLLIES ROAD, TAMWORTH**

**Order Effect:** Road closed to vehicular traffic between property number 2 and the junction with St Helens Road.

**Reason for Order:** To enable works for the renewal of a water pipe.

**Order Commences:** 3 August 2021 for up to 18 months.

**Anticipated Completion:** 3 August 2021.

**Access & Diversions:** St Helens Road, Park Road, Park Avenue, Hollies Road and vice versa.

**Contractor:** For Severn Trent Water: Mornings Utility Services, Tel: 0800 783 444.

**SECKINGTON LANE, NEWTON REGES**

**Order Effect:** Road closed to vehicular traffic from its junction with Main Road.

**Reason for Order:** To enable works for the laying of a new domestic gas service.

**Order Commences:** 3 August 2021 for up to 18 months.

**Anticipated Completion:** 6 August 2021.

**Access & Diversions:** Seckington Lane, Newton Lane, Hangmans Lane, Shuteington Lane, Main Road and vice versa.

**Contractor:** For Cabnet Gas, Highway Road Services Ltd, Tel: 0800 111 999.

**WESTWOOD ROAD, ATHERSTONE**

**Order Effect:** Road closed to vehicular traffic.

**Reason for Order:** To enable works for new pipe connection.

**Order Commences:** 2 August 2021 for up to 18 months.

**Anticipated Completion:** 4 August 2021.

**Contractor:** For Severn Trent Water, Gallagher's, Tel: 07860 534 669.

For all of the above Temporary Orders, pedestrian access to and egress from properties and land situated adjacent to the length of road to be closed will be maintained at all times. Vehicular access will be maintained where possible.

**S Danbury, Assistant Director of Governance & Policy, Shire Hall, Warwick, CV34 4EL. Date 19 Jul 2021**

**LICHFIELD DISTRICT COUNCIL  
PLANNING AND COMPULSORY PURCHASE  
ACT 2004 REGULATIONS 19 AND 20 OF THE  
TOWN AND COUNTRY PLANNING  
(LOCAL PLANNING) (ENGLAND)  
REGULATIONS 2012**

NOTICE OF THE REPRESENTATION PROCEDURE AND PERIOD FOR MAKING REPRESENTATIONS ON LICHFIELD DISTRICT LOCAL PLAN 2040 PUBLICATION (PRE-SUBMISSION) VERSION NOTICE IS HEREBY GIVEN that the Lichfield District Council's Local Plan 2040 Publication Version, Policies Maps, Sustainability Appraisal, Habitat Regulations Assessment and other supporting documents will be available for inspection under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 from Monday 6th July 2021. The documents will be available in the following locations:

- Lichfield District Council's website: [www.lichfielddc.gov.uk/localplan2040](http://www.lichfielddc.gov.uk/localplan2040)
  - Lichfield District Council's offices (by appointment): Lichfield District Council, District Council House, Frog Lane, Lichfield, WS13 6YZ.
  - Friary Grange Leisure Centre, Eastern Avenue, Lichfield, WS13 7EW.
  - Burnwood Leisure Centre, High Street, Chasetown, Burnwood, WS7 3XH.
  - Burnwood Library, Stanley's Corner, Bridge Cross Road, Chasetown, Burnwood, WS7 2BX.
- Representations on the Lichfield District Local Plan 2040 Publication Version are invited under Regulation 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The period for making representations on the Lichfield District Local Plan 2040 will last for 8 weeks, from:

5th July to 5pm on 30th August 2021. Only representations received within this period have a statutory right to be considered by the Planning Inspector at the subsequent Examination in Public. Late submissions will not be accepted.

Representations should be submitted using our Regulation 19 stage online consultation portal at:

<https://lichfielddc.consult.objective.co.uk/portal>

Alternatively, representations may be submitted on the Representation Form which is available electronically on the Council's website and in paper form from the District Council's offices (by appointment), Burnwood Leisure Centre, Burnwood Library and Friary Grange Leisure Centre. Representations during Regulation 19 can be made:

- Online through the consultation portal (<https://lichfielddc.consult.objective.co.uk/portal>)
- By completing a representation form (which is available to download from the website, or available in hard copy from the District Council offices, Burnwood Leisure Centre, Burnwood Library and Friary Grange Leisure Centre) and emailing it to [developmentplans@lichfielddc.gov.uk](mailto:developmentplans@lichfielddc.gov.uk).

- By completing a representation form and posting it to Spatial Policy & Delivery, Lichfield District Council, District Council House, Frog Lane, Lichfield, WS13 6YZ.

All representations received will be submitted to the Secretary of State and considered as part of the independent examination of the Plan by the planning inspector appointed by the Secretary of State.

For further information, please contact the Spatial Policy & Delivery team on 01543 308192 or email [developmentplans@lichfielddc.gov.uk](mailto:developmentplans@lichfielddc.gov.uk).



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## Local Plan - looking to the future



**Everyone is invited to give their views in the latest stage of our local plan review.**

The new local plan will guide how Lichfield District is developed up to 2040.

This pre-submission stage looks at whether the Lichfield District Local Plan 2040 is sound and legally compliant. All comments received will be sent to an independent planning inspector who will carry out a public examination of the plan.

To read the plan and find out how to give your views go to:  
**[www.lichfielddc.gov.uk/localplan2040](http://www.lichfielddc.gov.uk/localplan2040)**

### **Fazeley drop-in session**

See the plans and talk to council planners at:  
**Fazeley Town Hall on Tuesday 27 July, 2pm to 5pm**

**The deadline to give your views is by 5pm on 30 August 2021.**

*Lichfield*  
district council

# Emerging Local Plan

give us your views



**Your chance to influence our new Local Plan through  
our preferred options consultation.**

When approved, the new Local Plan will shape how Lichfield District is developed up to 2040. Please give us your views to make sure it reflects local growth needs and desires.

**See the plan and talk to our planners at our sessions at:**

- Fradley Village Hall - 5 December from 1.30pm to 5.30pm
- Fazeley Town Hall - 9 December from 3pm to 6pm
- Armitage Village Hall - 10 December from 3pm to 6pm
- Shenstone Methodist Church - 11 December from 3pm to 6pm
- Burntwood Memorial Institute - 16 December from 3pm to 6.30pm
- Colton Village Hall - 17 December from 1pm to 3pm
- Thomas Spencer Hall in Whittington - 18 December from 2.30pm to 5.30pm
- Alrewas Village Hall - 10 January from 4pm to 6pm
- Lichfield District Council's Council Chamber - 16 January from 3pm to 6pm

To read the draft Local Plan Preferred Options document and give your views,  
go to [www.lichfielddc.gov.uk/localplan2040](http://www.lichfielddc.gov.uk/localplan2040)

The plan will also be available at Lichfield District Council's Frog Lane  
reception and at Lichfield and Burntwood libraries.

**This consultation is running from  
29 November 2019 to 24 January 2020.**



*Lichfield*  
district council  
[www.lichfielddc.gov.uk](http://www.lichfielddc.gov.uk)



Local Plan 2040  
Duty to Co-operate Statement  
Regulation 19  
June 2021

DRAFT



*Lichfield*  
district council

## 1. Introduction

1.1 The duty to co-operate is a legal and soundness test that requires cooperation between local planning authorities and other prescribed bodies to maximise the effectiveness of policies for strategic matters in Local Plans. The duty to co-operate was introduced in the Localism Act 2011 and under Section 33A of the Planning and Compulsory Purchase Act 2004 all local planning authorities are required to engage constructively, actively and on an ongoing basis when preparing a local plan to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters.

1.2 In addition to the legal requirements set out above, the National Planning Policy Framework (NPPF) emphasises the importance of joint working and maintain effective co-operation between authorities and other prescribed bodies on cross boundary issues and issues of shared interest. The NPPF provides information at paragraphs 20 – 23 on the matters which strategic policies should make sufficient provision for and these matters may require effective co-operate. These matters include:

- Housing (including affordable housing), employment, retail, leisure and commercial development
- Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and provision of minerals and energy
- Community facilities
- Conservation and enhancement of natural, built and historic environment, including landscapes and green infrastructure and planning measures to address climate change mitigation and adaptation.

1.3 The NPPF goes on to provide further guidance in relation to the duty to cooperate at paragraphs 24 – 27, including the requirement for policy making authorities to prepare and maintain statements of common ground (SoCG). The purpose of the SoCG are to demonstrate that cross-boundary strategic issues have been jointly addressed and how they will be progressed moving forward by the Local Authority along with neighbouring authorities and the prescribed bodies. Planning practice guidance (PPG) provides further guidance on what is expected within a statement of common ground.

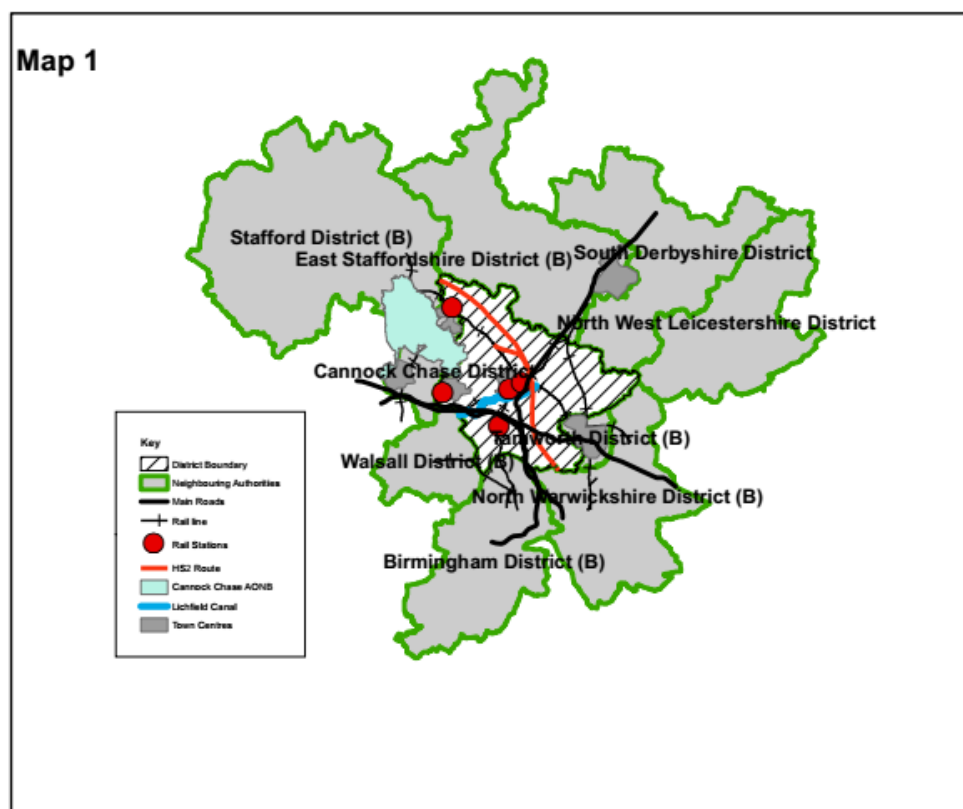
1.4 The Statement of Common Grounds will be prepared in addition to a Duty to Cooperate Statement and contain specific details on cross-boundary strategic matters that have been identified by the Council in association with the prescribed bodies and other relevant organisations.

1.5 This statement provides an overview of how Lichfield District Council has worked actively and on an ongoing basis to fulfil its duty to co-operate throughout the plan making process. This statement should be read in conjunction with the specific Statements of Common Ground.

## 2. Local Context

2.1 Lichfield District is bound by nine local authorities, these include Birmingham, Tamworth, South Staffordshire, East Staffordshire, Stafford, South Derbyshire, North West Leicestershire, Walsall, North Warwickshire and Cannock Chase. The Council falls within the Greater Birmingham and Black Country Housing Market Area (HMA) along with 14 other local authorities. The higher tier authority of Staffordshire County Council is also of relevance.





Map 1 - Location of Lichfield District Council to its neighbouring authorities

### 3. Duty to Co-operate Bodies

3.1 The duty to co-operate applies to all local authorities and county councils in England and a number of specified prescribed bodies. The prescribed bodies for which local planning authorities are to co-operate with are defined in Part 2, Regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012. In relation to Lichfield District, the following are considered to be neighbouring authorities and prescribed bodies:

#### County Councils

- Staffordshire County Council
- Warwickshire County Council
- Derbyshire County Council
- Leicestershire County Council

#### Unitary authorities

- Birmingham City Council
- Solihull Metropolitan Borough Council

#### Black Country Authorities

- Dudley Metropolitan Borough Council
- Sandwell Metropolitan Borough Council
- Walsall Council
- City of Wolverhampton Council

#### District authorities

- Cannock Chase District Council
- Stafford Borough Council
- East Staffordshire Borough Council
- Tamworth Borough Council
- North West Leicestershire District Council
- South Derbyshire Council
- North Warwickshire Borough Council

#### Prescribed Bodies

- Natural England
- Historic England
- Environment Agency
- Homes and Communities Agency
- Highways England
- Sport England
- Network Rail
- NHS South East Staffordshire and Seisdon Peninsula CCG
- NHS East Staffordshire CCG
- NHS England
- Civil Aviation Authority
- Office of Rail Regulation
- Ministry of Defence
- Integrated Transport Authority – Transport for West Midlands
- HSE

3.2 As set out above, Lichfield District lies within the Greater Birmingham & Black Country Housing Market Area (HMA), and therefore Lichfield District Council work collaboratively with all the authorities who fall within the HMA, including those not listed above who lie beyond the District's shared borders. In addition, although not defined by statute in the same way as the above prescribed bodies, Local Enterprise Partnerships and Local Nature Partnerships are bodies defined in the Regulations as bodies that local authorities have a duty 'to have regard to' in respect of Lichfield District. There are also other public bodies with whom Lichfield District Council needs to cooperate in order to plan for strategic cross-boundary matters. Collectively, in respect of Lichfield District Council these are:

- Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP)
- South Staffordshire Local Enterprise Partnership (SSLEP)
- Black Country Local Enterprise Partnership
- Cannock Chase SAC Partnership
- AONB Partnership
- River Mease SAC Partnership

3.3 Whilst many of the above bodies are engaged in active, on-going discussions with Lichfield District Council, it is appropriate to contact each of the bodies with whom there is a duty to co-operate at each stage of the local plan preparation and meetings have been held with relevant bodies where necessary.

## 4. Preparation of the Local Plan Review

4.1 The Lichfield Local Plan Strategy which covers the plan period 2008 – 2029 was adopted in February 2015. The second part of the Local Plan, the Local Plan Allocations was adopted in July 2019. During the Local Plan Allocations examination, the Inspector proposed a main modification to include Policy LPR: Local Plan Review, which commits the Council to carrying out an early of the Local Plan and includes a number of strategic matters which need to be considered with surrounding local authorities through the Duty to Co-operate. These matters are discussed in further detail below include the need for an appropriate contribution towards meeting the housing need arising from the Greater Birmingham and Black Country Housing Market Area (GBBCHMA).

4.2 Lichfield District Council commenced work on its Local Plan 2040 (formally known as the Local Plan Review) with an initial Scope, Issues and Options consultation taking place between April and June 2018. The Council has since consulted on its Preferred Options and Policy Directions in January 2019, Preferred Options in November 2019 and its Regulation 19 Publication Version in August 2021. At each of these stages, letters were sent to duty to co-operate partners seeking their views on the consultation document.

4.3 This duty to co-operate statement is a live document and will continue to be updated to reflect ongoing discussions and joint working as the Local Plan 2040 is progressed and Statements of Common Ground are prepared.

## 5. Cross- boundary Strategic Matters

5.1 There are a number of key strategic matters which underpin the adopted Local Plan and therefore the review of the Local Plan which require a collaborative cross-boundary approach and partnership working with various local authorities and prescribed bodies. To date, valuable co-operative working and partnership activity has taken place between Lichfield District Council and the duty to co-operate bodies as the review of the Local Plan has progressed over a number of years.

5.2 Table 1 below identifies the cross boundary strategic matters which need to be addressed by the Local Plan 2040. It highlights those specific issues which require on-going active cooperation between Duty to Co-operate partners.

Table 1 - Cross Boundary Strategic Matters

Cross boundary strategic matters identified	Specific cross boundary issues to be addressed through Duty to Cooperate / SoCGs
Housing needs and distribution	<ul style="list-style-type: none"> <li>Overall housing requirement – identifying an appropriate higher target to contribute towards unmet need within the HMA which is deliverable across the district.</li> <li>Ensuring that the scale and distribution of unmet housing need across with the Housing Market Area can be by the</li> </ul>

	authorities met through Duty to Cooperate
Gypsy and traveller needs and provision	<ul style="list-style-type: none"> <li>Facilitating adequate gypsy and traveller pitches and transit sites to address identified needs</li> <li>Lichfield District Council has worked collaboratively with Tamworth and North Warwickshire to identify and accommodate where appropriate gypsy and traveller needs and provision.</li> <li>LDC has worked with neighbouring authorities to establish if any have available sites to meet need that cannot be met due to lack of site availability in LDC.</li> </ul>
Employment land provision and jobs required	<ul style="list-style-type: none"> <li>Addressing any cross boundary issues regarding the provision of employment space</li> <li>Facilitating local economic recovery caused by the widespread disruption to the economy as a result of the Coronavirus pandemic.</li> </ul>
Retail, leisure and commercial development	N/A
Provision of transport infrastructure	<ul style="list-style-type: none"> <li>Addressing the delivery of development to ensure there are no detrimental impacts on the local highways network and the strategic road network</li> <li>Working with highways authorities and relevant partners on upgrades and works to major strategic roads intersecting the district, including the A5 and A38</li> <li>Facilitating the delivery of HS2 which crosses the district</li> </ul>
Provision of utilities infrastructure including telecommunications, digital, water and energy	<ul style="list-style-type: none"> <li>Working with Severn Trent to overcome the issues relating to the River Mease SAC</li> </ul>
Provision of communities facilities including health and education infrastructure and local facilities	<ul style="list-style-type: none"> <li>Provision of sufficient school place capacity in relation to site allocations to avoid cross boundary impacts</li> <li>Provision of sufficient healthcare facilities to accommodate future growth and changing healthcare priorities and needs</li> </ul>
Conservation and enhancement of natural and historic environment	<p>In relation to the natural environment:</p> <ul style="list-style-type: none"> <li>Ensuring a consistent approach to the conservation and enhancement of Protected Landscapes and their settings within the district</li> <li>Ensuring that the cumulative impact of proposed levels of growth does not</li> </ul>

	<p>result in likely significant effects on the European Sites</p> <ul style="list-style-type: none"> <li>• River Mease SAC</li> <li>• Cannock Chase SAC</li> <li>• AONB</li> </ul> <p>Historic Environment</p> <ul style="list-style-type: none"> <li>• Ensuring that the significant of heritage assets and their settings are conserved and enhanced</li> </ul>
Mitigation of and adaption to address climate change and managing flood risk	Mitigating / adapting to the effects of climate change including managing flood risk.

5.3 The list above seeks to outline the key strategic cross boundary issues and whilst themes listed with no identified issues are recognised as cross boundary and strategy, they are unlikely to require active collaboration between the Duty to Cooperate bodies in strategic planning terms.

## 6. Mechanisms for co-operation

6.1 Lichfield District Council is actively involved in a number of cross-boundary relationships that have informed the preparation of the Local Plan 2040. These relationships take different formats, many are formalised, regular meetings where a variety of topics are discussed and some are specifically tailored towards the Local Plan 2040.

6.2 These partnerships are an invaluable mechanism for facilitating duty to co-operate discussions and enable regular direct contact with a range of bodies. A number of these partnerships have actively engaged with the local plan process, and it has been a regular item on the agenda at meetings to discuss emerging evidence and specific issues.

6.3 A log of the meetings that have taken place between the Council and its duty to co-operate partners are attached at **Annex A**.

6.4 In addition, a number of strategies and evidence based documents that inform the review of the Local Plan and address cross boundary strategic matters were produced by or commissioned by at least one prescribed body for the duty to co-operate. A table of these strategies and studies are listed in **Annex B**.

## 7. Statements of Common Ground

7.1 Following a review of the cross boundary strategic issues and representations received to date in response to the local plan consultations and on-going partnership meetings, Lichfield District Council will produce Statements of Common Ground with the following partners:

- Local authorities within the Greater Birmingham Housing Market Area
- Local authorities within the Black Country Housing Market Area
- Local authorities within the Cannock Chase SAC Partnership
- Natural England
- Local authorities and stakeholders within the River Mease SAC
- Bodies within the AONB partnership



7.2 These Statements of Common Ground will cover cross boundary issues including contribution towards meeting the HMA shortfall, Cannock Chase SAC, HRA, transport as well as other matters.

## 8. Conclusions

8.1 Lichfield District Council has actively engaged with neighbouring authorities, stakeholders and partners throughout the preparation of the Local Plan 2040 and discussed with them all strategic matters.

8.2 This report, along with the Authority Monitoring Report, Consultation Statement and the Statements of Common Ground demonstrate how the council has complied with its duty to co-operate and will be used during Examination in Public to demonstrate how the Local Plan 2040 is based on effective joint working across local authority boundaries.

## Annex A – Duty to Cooperate Meeting Log

Date	Title/Attendees	Purpose of meeting
10/04/2018	AONB Officer Working group	To develop and agree strategies and plans consistent with AONB designation and to mitigate impact from development.
12/04/2018	Cannock Chase SAC Partnership (CCSAC)	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
16/04/2018	Greater Birmingham Housing Market Area (GBHMA) Meeting	To debate and agree on cross boundary evidence collection and approaches to meeting housing need across the Birmingham & Black Country HMA
03/05/2018	Cannock Chase SAC JSB	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
15/05/2018	Meeting with Stafford BC	Duty to Cooperate general discussion
23/05/2018	AONB Officer Working Group	To develop and agree strategies and plans consistent with AONB designation and to mitigate impact from development.
24/05/2018	Meeting with North West Leicestershire DC	DTC matters and Junction 11 of the A/M42
25/05/2018	Chaseline Workshop	To work with neighbouring authorities to support the long term aspirations for improved use of the Chase Line in the interests of sustainable development
29/05/2018	Sport England	Duty to Cooperate general discussion
30/05/2018	Cannock Chase District Council	General discussion regarding Duty to Cooperate and joint evidence.
06/06/2018	Birmingham City Council	Representation to Lichfield DC Local Plan Review Scope Issues and Options
07/06/2018	Rugeley Power Station Task Force meeting	To deliver coordinated development delivery across local authority boundaries
07/06/2018	CCSAC Partnership	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
12/06/2018	DTC Tamworth, North Warks, LDC	Discussion relating to DTC matters, Infrastructure Study and Statement of Common Ground
15/06/2018	River Mease Programme Board	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
21/06/2018	AONB Joint Committee	To develop and agree strategies and plans consistent with AONB designation and to mitigate impact from development.
29/06/2018	A5 Member Transport Partnership Group	Develop A5 strategy and ensure joined up working by partners to deliver A5 improvements
05/07/2018	CCSAC Partnership	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
11/07/2018	Meeting with Telford Council	Duty to Cooperate general discussion

12/07/2018	GBHMA Meeting	To debate and agree on cross boundary evidence collection and approaches to meeting housing need across the Birmingham & Black Country HMA
25/07/2018	Meeting with Tamworth BC	Statement of Common Ground
02/08/2018	CCSAC Partnership	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
10/08/2018	AONB Meeting	To develop and agree strategies and plans consistent with AONB designation and to mitigate impact from development.
29/08/2018	Tamworth Borough Council & North Warwickshire Borough Council	Discussion around local plan, Statement of Common Ground, Infrastructure Study, Local Plan evidence base, HEDNA and GTAA.
06/09/2018	CCSAC Partnership	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
08/09/2018	Tamworth BC, North Warwickshire BC	Statement of Common Ground signed in relation to housing and employment growth
20/09/2018	AONB Meeting	To develop and agree strategies and plans consistent with AONB designation and to mitigate impact from development.
22/09/2018	Staffordshire County Council	Education evidence
04/10/2018	CCSAC Partnership & JSB	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
11/10/2018	GBHMA meeting	To debate and agree on cross boundary evidence collection and approaches to meeting housing need across the Birmingham & Black Country HMA
07/11/2018	AONB Officer Working Group	To develop and agree strategies and plans consistent with AONB designation and to mitigate impact from development.
08/11/2018	CCSAC Partnership	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
22/11/2018	Staffordshire County Council	Transport Evidence
23/11/2018	A5 Transport Partnership Group	Develop A5 strategy and ensure joined up working by partners to deliver A5 improvements
23/11/2018	Staffordshire authorities	Ecological Joint approach
27/11/2018	Tamworth BC & North Warwickshire BC	General Duty to Cooperate discussion
03/12/2018	CCSAC Housing Growth Sub Group	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
06/12/2018	AONB Meeting	To develop and agree strategies and plans consistent with AONB designation and to mitigate impact from development.
06/12/2018	GBHMA Meeting	To debate and agree on cross boundary evidence collection and approaches to meeting housing need across the Birmingham & Black Country HMA
13/12/2018	CCSAC Partnership	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities

10/01/2019	CCSAC Partnership and JSB	Circulation of signed Memorandum of Understanding for method statement
11/01/2019	River Mease Partnership Technical Group	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
25/01/2019	River Mease Partnership Programme Board	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
04/02/2019	BGBBCHMA Working Group	To debate and agree on cross boundary evidence collection and approaches to meeting housing need across the Birmingham & Black Country HMA
19/02/2019	DTC Meeting TBC/NWBC/LDC	Joint evidence base collection work and cross boundary issues discussion
01/03/2019	A5 Officer Group	Develop A5 strategy and ensure joined up working by partners to deliver A5 improvements
07/03/2019	CCSAC Partnership	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
12/03/2019	AONB Meeting Member Meeting	To develop and agree strategies and plans consistent with AONB designation and to mitigate impact from development.
21/03/2019	Tamworth BC & North Warwickshire BC	General Duty to Cooperate discussion
22/03/2019	A5 Transport Partnership Group	Develop A5 strategy and ensure joined up working by partners to deliver A5 improvements
25/03/2019	GBHMA Meeting	To debate and agree on cross boundary evidence collection and approaches to meeting housing need across the Birmingham & Black Country HMA
04/04/2019	CC SAC Partnership + JSB	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
11/04/2019	GBHMA Officer working group	To debate and agree on cross boundary evidence collection and approaches to meeting housing need across the Birmingham & Black Country HMA
12/04/2019	River Mease SAC Partnership Technical Group	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
18/04/2019	River Mease SAC Partnership Programme Board	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
02/05/2019	CCSAC Partnership	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
14/05/2018	AONB Officer Working Group	To develop and agree strategies and plans consistent with AONB designation and to mitigate impact from development
05/06/2019	GBHMA Meeting	To debate and agree on cross boundary evidence collection and approaches to meeting housing need across the Birmingham & Black Country HMA
06/06/2019	Cannock Chase SAC Meeting	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
28/06/2019	A5 Transport Partnership Meeting - Officers	Develop A5 strategy and ensure joined up working by partners to deliver A5 improvements

12/07/2019	A5 Transport Meeting - Members	Develop A5 strategy and ensure joined up working by partners to deliver A5 improvements
12/07/2019	River Mease Partnership - Technical Group	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
18/07/2019	Cannock Chase DC	General Duty to Cooperate discussion
25/07/2019	Cannock Chase AONB Joint Committee	To develop and agree strategies and plans consistent with AONB designation and to mitigate impact from development
01/08/2019	Cannock Chase SAC Partnership	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
05/09/2019	Cannock Chase SAC Partnership	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
18/09/2019	River Mease Partnership - Programme Group	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
19/09/2019	GBHMA Meeting	To debate and agree on cross boundary evidence collection and approaches to meeting housing need across the Birmingham & Black Country HMA
03/10/2019	Cannock Chase SAC Partnership & JSB	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
04/10/2019	Cannock Chase AONB Annual Conference	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
08/10/2019	Tamworth BC & North Warwickshire BC	General Duty to Cooperate discussion
10/10/2019	River Mease SAC Partnership Technical Group	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
10/10/2019	Rugeley Power Station Task Group	To deliver coordinated development delivery across local authority boundaries
17/10/2019	River Mease SAC Partnership Programme Board	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
22/10/2019	South Staffs DC and Cannock Chase DC	General Duty to Cooperate meeting
24/10/2019	A5 Transport Partnership - Members meeting	Develop A5 strategy and ensure joined up working by partners to deliver A5 improvements
05/11/2019	Greater Birmingham HMA Meeting	To debate and agree on cross boundary evidence collection and approaches to meeting housing need across the Birmingham & Black Country HMA
07/11/2019	Cannock Chase SAC Partnership	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities



03/12/2019	Tamworth BC & North Warwickshire BC	General Duty to Cooperate discussion
05/12/2019	AONB Joint Committee Meeting	To develop and agree strategies and plans consistent with AONB designation and to mitigate impact from development
11/12/2019	GBHMA meeting	To debate and agree on cross boundary evidence collection and approaches to meeting housing need across the Birmingham & Black Country HMA
12/12/2019	Cannock Chase SAC Partnership	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
10/01/2020	River Mease SAC Partnership Tech Group	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
13/01/2020	South Staffs DC & Cannock Chase DC	General Duty to Cooperate discussion
14/01/2020	Black Country Plan - Duty to Cooperate Meeting	Evidence launch
15/01/2020	Midlands Connect	Consider transport issues across the region and input into strategy development for bidding and planning for infrastructure needs
15/01/2020	River Mease SAC Partnership - Programme Board	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
17/01/2020	A5 Transport Partnership Officer Group	Develop A5 strategy and ensure joined up working by partners to deliver A5 improvements
28/01/2020	Tamworth BC & North Warwickshire BC	General Duty to Cooperate discussion
06/02/2020	Cannock Chase SAC Partnership and JSB	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
12/02/2020	GBHMA	GBBCHMA/WMCA monitoring meeting - discussion over current monitoring data, housing deal, local plan updates
3/03/2020	Cannock Chase AONB officer Group	To develop and agree strategies and plans consistent with AONB designation and to mitigate impact from development
5/03/2020	Cannock Chase SAC Partnership and JSB	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
11/03/2020	Staffordshire Development Officers Group	Meeting of Heads of Local Plan policy across Staffordshire and SCC to discuss and agree cross boundary working approaches to evidence collection, responding to government consultations and other planning issues such as health provision infrastructure etc.
16/03/2020	River Mease partnership	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
24/03/2020	Tamworth BC & North Warwickshire BC	Email update - Evidence base updates - GTAA & Infrastructure study, local plan updates
27/04/2020	GBHMA	GBBCHMA/WMCA monitoring meeting - discussion over current monitoring data, housing deal, local plan updates

02/06/2020	GBHMA	GBBCHMA/WMCA monitoring meeting - discussion over current monitoring data, housing deal, local plan updates
04/06/2020	Lichfield and Black Country DtC	Informal discussions re need and meeting unmet need re housing & employment.
10/06/2020	River Mease technical group	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
10/06/2020	Staffordshire Development Officers Group	Meeting of Heads of Local Plan policy across Staffordshire and SCC to discuss and agree cross boundary working approaches to evidence collection, responding to government consultations and other planning issues such as health provision infrastructure etc.
16/06/2020	LDC & Birmingham City	Discussion re HMA need and the GB&BCHMA position statement
18/06/2020	Cannock Chase SAC Partnership	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
19/06/2020	River Mease JSB	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
Jun-20	Tamworth BC & North Warwickshire BC	Email update - Evidence Base Updates - GTAA & Green Belt Review, LP updates, Coronavirus impact on LP processes/appeals
01/07/2020	Cannock Chase AONB officer Group	To develop and agree strategies and plans consistent with AONB designation and to mitigate impact from development
3/07/2020	River Mease tech group	Telecon update
14/07/2020	Lichfield and Black Country DtC	Informal discussions re need and meeting unmet need re housing & employment.
16/07/2020	Cannock Chase AONB JSB	To develop and agree strategies and plans consistent with AONB designation and to mitigate impact from development
23/07/2020	Tamworth BC & North Warwickshire BC	Zoom meeting - Evidence Base Updates - GTAA, Green Belt Review & Infrastructure Study, LP updates, Coronavirus impacts on LP processes/appeals
06/08/2020	Cannock Chase SAC Partnership	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
03/09/2020	Lichfield and Black Country DtC	Informal discussions re need and meeting unmet need re housing & employment.
04/09/2020	Black Country Plan - Duty to Cooperate Meeting	General Duty to Cooperate discussion
9/09/2020	Staffordshire Development Officers Group	Meeting of Heads of Local Plan policy across Staffordshire and SCC to discuss and agree cross boundary working approaches to evidence collection, responding to government consultations and other planning issues such as health provision infrastructure etc
10/09/2020	Cannock Chase SAC Partnership	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
14/09/2020	GBHMA	Discussion re Standard Method for LHN

16/09/2020	Tamworth BC & North Warwickshire BC	Zoom meeting - Evidence Base Updates- GTAA, Green Belt Review & Infrastructure Study, LP updates, Coronavirus impacts on LP processes/appeals
8/10/2020	Cannock Chase SAC Partnership	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
8/10/2020	Tamworth BC & North Warwickshire BC	Zoom meeting - Evidence Base Update, LP Updates - LDC made others aware that draft local plan was reported to cabinet, Coronavirus impacts on LP processes/appeals
25/11/20	Cannock Chase AONB working group	To develop and agree strategies and plans consistent with AONB designation and to mitigate impact from development
06/11/2020	Tamworth BC & North Warwickshire BC	Zoom meeting - Evidence Base Updates - SHLAA's, ELAA, SFRA, Staffordshire Climate Change, LP updates, Coronavirus impacts on LP processes/appeals
03/12/2020	GBHMA	GBBCHMA/WMCA monitoring meeting - discussion over current monitoring data, housing deal, local plan updates
08/01/2021	Tamworth BC & North Warwickshire BC	Zoom meeting - Evidence Base Updates - SHLAA's, ELAA, SFRA, Staffordshire Climate Change, LP updates, Coronavirus impacts on LP processes/appeals
14/01/2021	Cannock Chase SAC Partnership	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
02/02/2021	Cannock Chase SAC Partnership visitor sub-group	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
18/02/2021	LDC & Solihull Dtc	Focus on SoCG for Solihull
08/03/2021	Tamworth BC & North Warwickshire BC	Zoom meeting - Evidence Base Update, LP Updates - LDC made others aware that draft local plan was reported to cabinet, Coronavirus impacts on LP processes/appeals
08/04/2021	Cannock Chase SAC Partnership	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
14/05/2021	Cannock Chase SAC Partnership	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
08/06/2021	Tamworth BC & North Warwickshire BC	Zoom meeting - Evidence Base Update, LP Updates - NWBC inspectors report expected shortly, Coronavirus impacts on LP processes/appeals
09/06/2021	Black Country Plan - Duty to Cooperate Meeting for whole HMA	General discussion re need
10/06/2021	Cannock Chase SAC Partnership	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
15/06/2021	GBHMA Meeting	Discussion over update to position statement to 2019/20 base date, strategic employment study, approaches to shortfall and implications at forthcoming examinations.
16/06/21	Staffordshire Development Officers Group	Meeting of Heads of Local Plan policy across Staffordshire and SCC to discuss and agree cross boundary working approaches to evidence collection, responding to government consultations and other planning issues such as health provision infrastructure etc.

05/07/21	River Mease Programme Board	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
08/07/2021	Tamworth BC & North Warwickshire BC	General Duty to Cooperate discussion
12/07/2021	Cannock Chase AONB Joint Committee	To develop and agree strategies and plans consistent with AONB designation and to mitigate impact from development
12/07/2021	Staffordshire County Council	Highways Evidence
14/07/2021	Staffordshire County Council	Education needs
26/07/2021	Tamworth BC & LDC DtC	Presentation to Tamworth BC full Council on reg 19 plan
29/07/2021	LDC & South Staffs DtC	Discussion re LDC reg 19 consultation
04/08/21	Cannock Chase SAC Partnership JSB	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
12/08/21	Cannock Chase SAC Partnership Project Group	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
01/09/21	GBSLEP Planning Sub Group	Introduce LDC Local Plan manager to the group taking over from current attendance by Head of Economic Growth & Development Work through terms of reference and future work to be considered.
08/09/21	Tamworth BC & North Warwickshire BC	General Duty to Cooperate discussion
08/09/21	Staffordshire Development Officers Group	Meeting of Heads of Local Plan policy across Staffordshire and SCC to discuss and agree cross boundary working approaches to evidence collection, responding to government consultations and other planning issues such as health provision infrastructure etc.
09/09/21	Cannock Chase SAC Partnership Project Group	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
15/09/21	Tamworth BC	General Duty to Cooperate discussion
07/10/21	Cannock Chase SAC Partnership Project Group	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities

08/10/21	Tamworth BC & North Warwickshire BC	General Duty to Cooperate discussion
11/10/21	Staffordshire County Council	Transport evidence
19/10/21	Greater Birmingham and Black Country Housing Market Area monitoring meeting	To debate and agree on cross boundary evidence collection and approaches to meeting housing need across the Birmingham & Black Country HMA
8/11/2021	LDC & Birmingham City	Cross boundary & GB&BC need discussions
9/11/2021	LDC & South Staffs DC	Cross boundary & GB&BC need discussions
10/11/2021	LDC & Cannock DC	Cross boundary & GB&BC need discussions
10/11/2021	LDC & Stafford Borough DC	Cross boundary & GB&BC need discussions
11/11/2021	Cannock Chase SAC Partnership Project Group	To develop and agree strategies and plans to deliver mitigation from development for the SAC area by competent authorities
18/11/2021	Tamworth & LDC	Cross boundary & GB&BC need discussions
18/11/2021	LDC & Natural England	SAC designation and air quality discussions
22/11/2021	Black Country & LDC	Cross boundary & GB&BC need discussions
23/11/2021	Staffordshire CC & LDC	Local Plan discussions

NB - In addition to the above, LDC & Staffordshire CC have held joint meetings with allocated site promoters as and when requested / required.

## Annex B – Jointly Produced Strategies and Evidence

Project / Strategy	Commissioned / Produced by	Purpose
Housing and Economic Development Needs Assessment	Lichfield District Council and Tamworth Borough Council commissioned GL Hearn to undertake the study	To identify the size, type and tenure of homes and employment requirements that will be need in the future across the plan period to 2040, and the housing needs of different groups including affordable housing. This is within the context of the minimum number of homes for each authority required under the standard method for calculating local housing need using the methodology set out in the Planning Practice Guidance.
Infrastructure Delivery Plan	Lichfield District Council in cooperation with a range of infrastructure providers	The IDP identifies deficiencies and surpluses of infrastructure and looks at what is require in the future, when it will be required, who is responsible for providing it, how it will be funded and any funding gaps.
Transport Assessment	Lichfield District Council in cooperation with Staffordshire County Council and Highways England	The Transport Assessment provides transport evidence to support of emerging Local Plan.
Joint Level 1 Strategic Flood Risk Assessment	Lichfield District Council together with South Staffordshire Councils commissioned JBA to produce the assessment	The SFRA assesses the risk of flooding to the area from all sources, now and in the future, taking account of the impacts of climate change
Cannock Chase SAC	Lichfield District Council form part of the Cannock Chase SAC Partnership who commissioned Footprint Ecology to undertake evidence base reports on visitor impacts	The partnership has a MoU. The report provides the background and evidence base to inform the action needed to mitigate any impacts from visitors from new development.
Birmingham HMA Strategic Growth Options Study	Lichfield District along with other authorities in the Greater Birmingham HMA informed the Strategic Growth Options study undertaken by GL Hearn	The Growth Options Study provided a high level assessment to identify potential growth options for housing development within each authorities in the Birmingham HMA to contribute towards meeting the housing shortfall
A5 partnership	Lichfield District in partnership with 15 other authorities that have the A5 running through supported by Highways England and Midlands Connect.	The partnerships raises awareness of the importance of the increasing economic role of the A5 through the Midlands and collaborates to effectively plan for growth impacts affecting the A5 and to develop a strategy for the A5.



Chase Line Stakeholder Meetings	Cannock Chase DC, Lichfield DC, South Staffs and Staffordshire County Council alongside other stakeholders such as West Midlands Rail Executive, West Midlands Trains and other community groups	Stakeholder meetings provide updates on issues and improvements relating to the Chase Line Rail service.
Cannock Chase AONB	Lichfield District along with the AONB partnership	The group has a MoU and has a commitment in the adopted and emerging Local Plan to work together on management for the AONB. A number of documents are being co-prepared to assist with land management. The authority also provided support for developing strategies and funding initiatives
River Mease	Lichfield District along with the other members of the River Mease SAC partnership North west Leicestershire, South Derbyshire, Environment Agency, Severn Trent and Natural England	The partnership has a MoU and works collaboratively undertaking survey work to establish river quality, flow and on mitigation solutions via developer contributions.
Climate Change adaption & Mitigation Study	Staffordshire District and City Councils and Staffordshire Country Council	Joint study commissioned on climate change adaption & mitigation to inform Local Plan policies and Strategies.

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Statement of Common Ground  
between Lichfield District Council  
and [Insert Local Authority Name]

DRAFT



# Statement of Common Ground (SoCG) between Lichfield District Council (LDC) and [Insert Local Authority Name]

## Introduction

1. This Statement of Common Ground (SoCG) has been prepared by Lichfield District Council (LDC) and [Insert name], hereafter referred to as “the parties” to inform the submission of the Lichfield Local Plan 2040.
2. This SoCG has been prepared in accordance with national guidance and is intended to cover matters of strategic importance relevant to the parties. It documents those matters agreed by the parties regarding the Lichfield Local Plan 2040 and any areas which remain subject to further discussion and therefore will be updated accordingly. [insert here text to reflect contents of SoCG / outstanding issues]

## Geography covered by Statement of Common Ground

3. This SoCG covers the Local Planning Authority areas of Lichfield and [Insert name].
4. These authorities are both within the Greater Birmingham & Black Country Housing Market Area (GBBCHMA). The GBBCHMA is made up of 14 authorities including Birmingham City Council, Bromsgrove District Council, Cannock Chase District Council, Dudley Metropolitan Borough Council, Lichfield District Council, North Warwickshire District Council, Redditch District Council, Sandwell Metropolitan Borough Council, Solihull Metropolitan Borough Council, South Staffordshire District Council, Stratford upon Avon District Council, Tamworth District Council, Walsall Metropolitan Borough Council and Wolverhampton City Council.

## Key Strategic Matters

5. The local authorities have had on-going dialogue on cross-boundary planning issues over the course of many years, discussing a broad range of planning issues including strategic matters. [Insert here summary of issues pertaining to the relevant authority] These discussions have informed the development of adopted plans and other related documents.
6. The following issues are considered to be the key strategic matters with regards to on-going plan making, although there are other issues which may have cross boundary impacts. Both authorities are committed further dialogue moving forward, not just limited to the periods of plan preparation.

## Housing

7. Lichfield District Council along with [Insert name] have been active members of the GBSLEP HMA Technical Officers Group [where this applies] since it was established and both authorities have contributed to discussions relating to the delivery of unmet housing need within in the HMA.
8. The GBBCHMA authorities published a position statement in 2020 in respect of housing needs. This statement details that the need arising from Birmingham in particular has primarily now been met. Additionally, unmet need arising from the Black Country authorities is detailed within the position statement and it is anticipated this need will begin to arise part way through the plan period from 2027/28 onwards. The GBBCHMA authorities are currently in the process of updating the 2020 position statement, however at the time of writing this updated statement has not yet been completed.

9. Lichfield District Council as part of the Local Plan 2040 are proposing to contribute 2,665 to the HMA shortfall from 2027. Of the 2,665 homes, a capped contribution of 2,000 is to be made for the Black Country authorities' needs starting after 2027 to assist with their identified shortfall up to 2040. This contribution is considered by Lichfield District Council to be appropriate and deliverable within the District in addition to Lichfield District Councils Local Housing Need. [Insert here whether the LPA agrees / disagrees with HMA contribution]. Whilst [Insert name] are supportive / have concerns about this figure [delete as appropriate] for the following reasons [insert reasons], this amounts to an issue of soundness of the Local Plan 2040. [Insert name] agree that Lichfield District Council has satisfied the legal duty to cooperate test.

10. It is acknowledged that Lichfield District Council published consultation material and invited comments relating to its Local Plan 2040 process at the following stages:

- Scope, Issues and Options – April and June 2018
- Preferred Options and Policy Directions – January and March 2020
- Preferred Options – November 2019 and January 2020
- Publication Version – July and August 2021

11. At each stage [Insert name] have been consulted on these documented and responded as they considered appropriate.

12. Other HMA evidence / Green belt release discussions

Other Strategic Matters / Cross boundary matters

Employment

13.

Transport

14. Lichfield District Council and [Insert name] are committed to continue working together in partnership, with the aim of ensuring the necessary transport and highways improvements to support sustainable growth across the housing market area. Both parties will keep each other fully informed of any changes to highways improvements and will continue to liaise on this matter where appropriate.

Gypsy & Traveller Provision

15. Lichfield District Council will support the delivery of a minimum of seven residential pitches to meet the identified needs of gypsies and travellers to 2040 including meeting the identified need for four of these pitches by 2024.

16. Lichfield District Council and [insert name] will continue to cooperate with neighbouring authorities within the HMA area in relation to housing matters, including gypsy and traveller provision.

Infrastructure

16.

Natural and Historic Environment

17.

## Signatures

We confirm that the information in this Statement of Common Ground reflects the joint working to address identified strategic matters that has been undertaken between Lichfield District Council and [Insert Name]. The authorities will continue to work together to address cross-boundary issues

### **Lichfield District Council**

**Name:**

**Position:**

**Signature:**

**Date:**

**[Insert Name]**

**Name:**

**Position:**

**Signature:**

**Date:**



Representation Reference	Consultee/ Agent	Section	Duty to Cooperate	Legally and procedurally Compliant?	Is the plan sound? (inclusive of positively prepared, justified, effective and compliance with NPPF)	Does the respondent suggest changes	Does the respondent wish to appear at EIP	Comment Summary	Changes Required	Officer Response
L1	CLlr David Thompson (Shenstone Parish Council)	GTAA	Yes	Yes	Yes, No, Yes, Yes	Yes	Yes	<p>Shenstone Parish Council has within its boundary a travellers site on land not originally designated as such. Shenstone Parish Council maintain that this result in Stonnall was in part a result of historic inadequate provision by LDC to provide sites in more appropriate locations. The 2007 accommodation assessment had identified the need for 19 pitches in the District Council area to 2026 and when the Gravelly Lane site was occupied initially without planning permission in 2017. At that time only 7 pitches were available in the District Council area. This is still the position, a shortfall of 12 pitches fourteen years after the needs assessment.</p> <p>Shenstone Parish Council challenges the Lichfield District Council Local Plan justification of only 7 additional pitches by 2040 is based on shortfalls in assessing need in the November 2019 Gypsy and Traveller Accommodation Assessment (GTAA). This follows the 2018 inspection at Gravelly Lane, where the Inspector highlighted that there has been a gross under provision over many years.</p> <p>There is no evidence of any consultation with existing landowners revealing their disposition to growth of the sites they own or explanation of existing owner/site extra land ownership potential. The previous policy sought to locate traveller sites around Key Rural Settlements as they contained the supportive amenities necessary to sustain traveller sites. In 2018 the Gravelly Lane Planning Inspector gave only “moderate weight” to the location in the Green Belt.</p> <p>The GTAA has primarily taken as evidence of need from the traveller households on existing sites. There is no evidence of consultation with organisations representing travellers regionally or nationally about needs. The GTAA states that “recent evidence suggests that Lichfield has a need for traveller transit provision. However, that transit need has not yet been delivered.” The roadside and transit demand has not been engaged in forming the proposals. The transient demand may also point to the need for permanent pitches, this has not been considered. As site under provision has been a reality since 2007 the commitment to “consider all available delivery mechanisms” in 2024 in the event that additional provision has not been secured is weak as the commitment to “consideration” in 2024 could take several years further to be developed.</p>	No changes required.	Local Plan 2040 includes policies in relation to the provision of accommodation to meet the identified gypsy and traveller accommodation requirements. This is supported by a Gypsy and Traveller Accommodation Assessment (GTAA) which forms part of the evidence to the Local Plan 2040 and updates previous evidence. The Local Plan 2040 acknowledges that insufficient deliverable sites have been identified to meet the requirements and proposes a criteria based policy in order to proactively provide for such needs.
L2	Tamworth and District Civic Society	SHA2	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	<p>Disappointed that LDC appears to be ignoring overwhelming opposition - on sound planning grounds - by local residents and organisations, and neighbouring authorities, to proposals for 800 houses at Mile Oak.</p> <p>The removal of land at Mile Oak from the Green Belt and proposal for 800 homes is unsustainable in terms of transport infrastructure and other services, including health and education.</p> <p>The impact and burden of the increased population will fall to Tamworth whilst all Council Tax income will go to Lichfield District. Ecological and environmental damage from loss of Green Belt, open land, flora and fauna and by association quality of life and physical and mental wellbeing will be affected. The development would destroy the rural character of Mile Oak and harm heritage and identity.</p> <p>Existing and proposed developments within LDC at Arkall Farm and land north of Browns Lane are removing any visual and Green Belt boundary between those areas and Tamworth.</p>	No changes required.	Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. The District Council works with neighbouring authorities including Tamworth Borough Council through the duty to cooperate. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered. Local Plan 2040 contains detailed policy in respect of heritage assets. Transport evidence is being undertaken having being postponed due to the coronavirus pandemic. Raw data has been collected to inform appropriate mitigation.
L3	Craig Alsbury (Avison Young) for Metacre Ltd	Whole Document	No	Yes	No	Yes	Yes	<p>No Statements of Common Ground have been released with the Publication version Local Plan 2040, therefore it is unclear whether the Duty to Co-operate has been satisfied and how cross boundary issues have been addressed.</p> <p>Consider that the Plan is not sound, has significant concerns relating to certain aspects of the Plan and the technical evidence that underpins it. The approach the Council is taking in relation to Policy SP1: Spatial Strategy is at odds with the settlement hierarchy. There are two major soundness issues with this. Firstly, directing the least amount of development (4%) to the Districts second most sustainable settlement is not sustainable nor acceptable. It is noted that the 4% of growth directed to Burntwood is already committed by planning permission so the Local Plan is making no provision for growth at Burntwood at all. Secondly, directing almost a third of the growth that is required to the service villages is at odds with the settlement hierarchy and is equally not sustainable or supported by evidence.</p> <p>It cannot be right that Green Belt releases are justified adjacent to less sustainable settlements but that the existence of Green Belt around Burntwood is regarded as an insurmountable obstacle to its expansion. The plan fails to direct a level of growth to Burntwood that is consistent with its size, sustainability, credentials and position in the settlement hierarchy and relationship with conurbations.</p> <p>Policy SP1 states that the Local Plan addresses the District’s local housing need which the Council has calculated to be 321 dwellings per annum, or 7,062 over the Plan period. However, the Council’s HEDNA 2020 states that Lichfield’s baseline housing need, applying the standard method, is 331 dwellings per annum. It is not clear from the Council’s evidence why the Local Plan provides for less development than calculated by its advisers.</p> <p>Metacre welcomes the fact that the Council is proposing to address some of the unmet housing need that is arising elsewhere in the HMA. However, there are serious concerns about the lack of evidence underpinning the 2,655 dwelling figure quoted in Policy SP1. We cannot find any evidence that explains or justifies the figure that the Council has settled on. There is no explanation of the derivation of the figure in either housing need or land supply terms. In regards to flexibility, the Local Plan must be supported by appropriately detailed evidence on housing delivery in order for its assertions in respect of in-built flexibility to be tested. There are major concerns about the site selection process and these are compounded by the fact that the evidence base for this matter is incomplete.</p> <p>The Plan makes no provision for safeguarded land and there is no evidence of the Council having addressed itself to the question of what its development needs will be beyond the Plan period and whether, as a consequence of these, it is likely to have to alter its Green Belt boundaries at the end of the Plan period.</p>	No changes required.	<p>LDC can demonstrate extensive DtC work undertaken with neighbouring bodies and which will be made available for the plan submission and examination.</p> <p>Housing requirement within the Local Plan 2040 provides for the Local Housing Need (LHN) as established by the Standard Methodology and supported by evidence within the HEDNA. Local Plan 2040 provides contribution toward unmet needs arising from the GBBCHMA, contribution is considered to be appropriate and soundly based.</p> <p>A wide range of evidence base has been used when determining the spatial strategy and proposed allocations within the Local Plan 2040. The evidence base supporting the Local Plan 2040 is directly referenced within the explanatory text within the Local Plan 2040. The Site Selection Paper 2019 was prepared at the time of the assessment. Further evidence has been prepared and published in support of the Local Plan. The Local Plan 2040 seeks to deliver sufficient homes to meet the housing requirement of the plan in accordance with the spatial strategy.</p> <p>Local Plan 2040 makes clear that an area action plan for Burntwood will be progressed following the adoption of the Local Plan 2040.</p>
L4	Ian MacLeod (Birmingham City Council)	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	<p>Birmingham City Council has been fully engaged with Lichfield Council, alongside all other local authorities within the Greater Birmingham and Black Country Housing Market Area, since the Birmingham Development Plan (BDP) was adopted in 2017 and confirmed a housing shortfall of 37,900 homes up to 2031. The City Council is grateful for the help and co-operation received from Lichfield in making significant progress thus far towards reducing the HMA shortfall.</p> <p>The key strategic cross boundary issue for Birmingham is the unmet housing need for the Greater Birmingham and Black Country HMA. Birmingham City Council therefore welcomes the contents of the proposed Publication Document including the themes, issues, vision and objectives set out in Chapter 3. In particular, BCC supports the key issue identifying the need to meet strategic housing and employment requirements, not just for the District itself, but for the wider Housing Market area.</p> <p>In relation to the provision of housing Paragraph 4.22 stipulates that “a capped contribution of 2,000 is to be made for the Black Country authorities’ needs starting after 2027 to assist with their identified shortfall up to 2040.” We believe that the current splitting of the contribution does not reflect the functional relationship between Birmingham and Lichfield in terms of travel to work patterns and connectivity which is far stronger than the relationship between Lichfield and the Black Country in these terms.</p> <p>There is still a still a housing shortfall for Birmingham and this is likely to grow further up to, and beyond 2031 for the reasons stipulated. If a split is deemed to be necessary, then a numerical contribution should consider the functional relationships between Lichfield, Birmingham and the Black Country, and be apportioned based on evidence around travel to work areas and connectivity. It is considered that this evidence would lead to a split in favour of Birmingham or, at the very least, a 50/50 split between Birmingham and the Black Country.</p> <p>Welcomes the opportunity to discuss this matter in more detail with LDC and the Black Country authorities with a view to agreeing the split in a Statement of Common Ground.</p> <p>Paragraph 8.6 refers to a buffer to provide flexibility in the housing supply across the plan period. Whilst BCC agree that some degree of a buffer is required for the purposes highlighted in paragraph 8.6, the buffer level identified (36.7%) seems excessive and the Local Plan does not signpost any evidence or provide any explanation as to how this buffer level has been derived. Given that there is an immediate housing shortfall within the HMA, there needs to be more explanation as to why a greater of this buffer could not be used to further offset these HMA housing shortfalls.</p>	No changes required.	Local Plan 2040 seeks to plan for the Councils established local housing need and contribute to unmet need from the wider housing market area in accordance with national policy and guidance and the plan's supporting evidence. Housing supply evidence from the Five Year Housing Land Supply and Strategic Housing Land Availability Assessment supports the Local Plan 2040.
Welcomes the opportunity to develop an agreed Statement of Common Ground.										

Representation Reference	Consultee/ Agent	Section	Duty to Cooperate	Legally and procedurally Compliant?	Is the plan sound? (inclusive of positively prepared, justified, effective and compliance with NPPF)	Does the respondent suggest changes	Does the respondent wish to appear at EiP	Comment Summary	Changes Required	Officer Response
LS	Mr and Mrs Moss	No	No	No	No	No	No	<p>LDC has not worked with other councils or the local community when selecting SHA2 at Mile Oak. The council have ignored hundreds of objections to SHA1 raised by the local community.</p> <p>SHA2 is located in Green Belt. The plan does not comply with NPPF policy on protecting the Green Belt. the Local Plan is unsound as exceptional reasons required to justify 800 homes in this location in the green belt are not set out in the local plan. SHA2 does not meet the objectives in the sustainability appraisal. The results of the 2019 Green Belt Review have not been interpreted correctly.</p> <p>Brownfield sites and sites not in the Green Belt should be chosen before SHA2, SHA2 should not have been chosen before gathering all evidence such as traffic assessment and impact on local infrastructure. SHA2 is too big when compared to existing Fazeley ward.</p> <p>The local plan is not effective or deliverable over the plan period as the infrastructure requirements of SHA2 have not been fully considered on traffic such as the A453. High school places haven't been considered. Allocation of SHA2 is not consistent with the NPPF: Section 5, Section 8. Section 13, Section 14, Section 15.</p>	No changes required.	<p>Council have worked with those authorities to whom the Duty to Cooperate applies throughout the progression of the Local Plan 2040.</p> <p>Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered across the plan period. Local Plan 2040 includes policies to ensure appropriate infrastructure is delivered.</p> <p>LDC has worked with infrastructure providers to support the development. Site is selected having regard to evidence base in Green Belt study and because exceptional circumstances exist to meet identified housing need.</p>

## Update on Development Management Service Review & Improvement Plan

Councillor Angela Lax, Cabinet Member for Regulatory, Housing & Health

Date: 7<sup>th</sup> December 2021

Agenda Item: 6

Contact Officer: Claire Billings

Tel Number: 01543 308171

Email: Claire.billings@lichfielddc.gov.uk

Key Decision? No

Local Ward Members N/A



**CABINET**

### 1. Executive Summary

- 1.1 A report was considered by Cabinet at its meeting on the 7<sup>th</sup> September setting out issues facing the Council's Planning Development Management Service and seeking approval to restructure the service and invest in additional resources to support its improvement. The report was presented in response to identified pressures facing the service and concerns over performance and customer responsiveness. Cabinet duly agreed the proposals, but also asked that a paper be brought back to it in due course to show progress on the changes to be implemented and their impact. This is the first paper of those progress papers which looks at the period since September.

### 2. Recommendations

- 2.1 That Cabinet notes the performance of, and the progress being made by the Development Management Service in terms of implementing the revised structure and with regard to its improvement programme.

### 3. Background & Issues

- 3.1 DM/Planning is a high-profile service activity with local residents and communities having a keen interest in proposals and planning decisions impacting on their area and amenity. Planning is also a key component of the local economy with housing, employment and other types of development necessary to meet needs. The importance of having an effective and capable planning system is recognised by all levels of government, from national to local as well as private sector industry. To this end planning is one discipline where there are national performance indicators for local planning authorities based on speed of decision making and the quality of decisions and sanctions applied where performance against such indicators is not met.
- 3.2 The DM Service deals annually with a high number of applications. There was an increase of 26% in the number received between comparable periods in 2020 and 2021, however in the last quarter the overall number of applications submitted have reduced between Q1 and Q2 by approx. 18 %. The following table sets out the number of applications received over the last 1.5 years, by quarter and by type:

	<b>Apr20- Jun20 Q1</b>	<b>Jul20- Sept20 Q2</b>	<b>Oct20- Dec20 Q3</b>	<b>Jan21- Mar21 Q4</b>	<b>Apr21- Jun21 Q1</b>	<b>Jul21- Sep21 Q2</b>
<b>Total Applications received</b>	315	366	396	471	471	385
<b>including</b>						
• <b>Major applications</b>	11	14	15	15	7	8
• <b>Pre app requests</b>	51	54	53	81	67	41
• <b>Valid planning appeals</b>	11	4	15	5	6	2

3.3 In terms of Planning Enforcement, the following table shows the number of logged and closed cases per quarter over the last 12 months and current quarter to date/to mid Nov 2021:

Enforcement	New cases opened	Cases closed	% (cases closed/new cases opened)	Ongoing carry over
2020/21 – Q3	41	26	63.4%	118
2020/21 – Q4	44	19	43.2%	143
2021/22 – Q1	68	22	32.4%	189
2021/22 – Q2	49	12	24.5%	230
2021/22 – Q3 (to date)	25	0	0	255*

3.4 **Performance.** This is regularly monitored, with 6-monthly DM performance Briefing Papers being reported to Overview & Scrutiny. The following tables include details of the number of applications determined and the performance recorded by quarter, split into major and non-major applications from Q3 of 2020/21 to midway in Q3 (up to mid Nov 2021) of 2021/22. This shows:

- that the Council is performing well against the national indicators; above the national targets for speed of determination (more than 60% for majors and more than 70% for non-major category applications).
- there has been improvement in the performance from Q1 to Q2 of 2021/22. There remains reliance on agreed extensions of time to meet the national indicator targets, however these are agreed extensions of time, as 'agreed' in writing with applicants/agents and can be calculated positively in the national indicators. This shows the willingness of applicants to work with the Council to achieve better outcomes and/or as part of positive engagement in the planning application process, as endorsed by national planning policy guidance.

#### Major Applications:

Major Applications	Total received (No)	Total determined (No)	Target Performance <91 days (%)	Actual determined <91 days (No)	%	Determined outside target (No)	%	Extensions agreed (no)	% of total determined
2020/21 Q3	15	4	60%	3	75.0%	1	25%	3	75.0%
2020/21 Q4	15	7	60%	5	71.4%	1	14.3%	4	57.1%
2021/22 Q1	7	13	60%	10	76.9%	3	23.1%	10	76.9%
2021/22 Q2	8	10	60%	9	90.0%	1	10.0%	9	90.0%
2021/22 Q3 (to date)	2	8	60%	6	75.0%	2	25.0%	7	87.5%

## Non-Major applications

Non-Major Applications	Total received (No)	Total determined (No)	Target Performance <57 days (%)	Actual determined <57 days (No)	%	Determined outside target (No)	%	Extensions agreed (no)	% of total determined
2020/21 Q3	193	182	70%	135	74.2%	47	25.8%	87	47.8%
2020/21 Q4	201	182	70%	133	73.1%	49	26.9%	83	45.6%
2021/22 Q1	265	178	70%	122	68.5%	56	31.5%	79	44.4%
2021/22 Q2	216	252	70%	211	83.7%	41	16.3%	110	43.7%
2021/22 Q3 (to date)	88	129	70%	108	83.7%	21	16.3%	62	48.1%

**3.5 Service Improvements.** In response to concerns raised about the challenges, performance and customer responsiveness of the Service, an Improvement Plan was produced and is being implemented since the end of 2020. The Plan and updates made thereto are set out in **Appendix 1**. In summary, the actions that have occurred to date, include:

- Customers Engagement- Training has taken place with planning staff to impress the importance of good customer care, including keeping applicants and agents abreast of progress with proposals.
- Via the Cabinet Member, efforts have been made to improve communications between the service and elected members, so that members can engage in a more informed manner with local residents when planning matters arise. This has and will continue to be supplemented by planning member training sessions being scheduled, that are open to all members of the Council to explain planning policy and processes and the role/function of the Council as local planning authority.
- A revised set of member protocols has been produced to explain the role of members on planning committee and those non-committee members; who as members get involved in matters on behalf of their local residents / applicants. The protocols help to clarify what is and isn't good practice and ensure that members, officers and all other interested parties understand each other's responsibilities.
- A key team leader vacancy was filled 6-months ago on a permanent basis; they have settled in well and this has brought some much-needed stability and better support to the applications team, helping to build the team morale.
- Managers in the team were given mentor support and have or are also undertaking corporate management training.
- Work has progressed on the implementation of the new team structure- following subsequent Council approval of this, market supplements were added to certain posts from October and any temporary posts made permanent; job descriptions were written and/or updated for the new posts to be recruited and those that needed to be, were job evaluated. Meetings have been held with external parties to support an alternative to the norm approach to recruitment and a company engaged to progress this. This is to seek a better reach of applicants and to communicate and stimulate a good response in terms of applicants as part of the recruitment process. The 8 number posts have been advertised internally and are due to go live externally at the end of November, using a microsite approach and targeted advertising.
- Meetings are being held regularly with IT and customer services, to help clear blockages and/or provide greater support to the Service in terms of performance/efficiencies and enhanced customer engagement; in conjunction with the Building a Better Council project.
- A planning member training session on Planning Enforcement is scheduled for December and the Enforcement Plan updates are being considered as part of this.
- Extra interim consultant support has been brought into the planning enforcement team to help progress paperwork in this area, to seek to deal with cases quicker and progress some more major cases.

- 3.6 The planning applications team, however, currently has 4.6 FTE vacancies based on the previous structure and 8.6 FTE based on the approved new structure. Currently, the team has approx. 3.5 FTE consultant officers supporting the team, due to the vacancies, with 1.4 FTE consultant interims in the enforcement team and approx. 2 FTE in the planning officer team; covering a planning officer and a principal officer post. In addition, 2 part time officers within the team have increased their hours for an interim period.
- 3.7 The permanent recruitment process has been progressing since Cabinet approval in September. Council approved the revised structure in October. The new job descriptions and person specifications have been written and job evaluated; where required. The Council has also engaged a specialist recruitment company to support a more enhanced and targeted approach to advertising, in view of the number of posts and to seek to attract more applicants than previous advertising campaigns from the planning team. This includes preparation of a microsite and targeted advertising. The job adverts have been advertised internally and are expected to be live external from the end of November 2021, with the deadline for applicants by early January. Subject to shortlisting applicants, it is hoped that interviews will take place mid/end of January and appointment of posts be in place for April 2022.
- 3.8 In addition to this, further interim support has also been sought for the team, with interviews undertaken with consultants. However, this has proved difficult, due to limited availability of skilled interim senior planning consultants at this time; making it a very competitive market, with contracts being declined after offers have been made. Meetings have also been held with companies who may be able to take on certain application work on behalf of the Council, but they have limited scope and capacity in regard to major application support, but this is being further investigated.
- 3.9 The timescales needed to undertake permanent recruitment and ability to source further senior interim officer support is continuing to place pressure on the team. Therefore, officers remain to carry high workloads, including in particular, at the senior/principal level. The applications team leader is furthermore currently needing to balance a caseload of applications and management of the applications team at the same time.
- 3.10 **Complaints.** The following shows the number of and reasons for complaints in regard to the DM service for the last 1.5 years. This shows that there has not been an overall increase in complaints in respect of the DM service area, the Q2 of 2020/21 and 2021/22 receiving the same number of complaints

	Apr20- Jun20	Jul20- Sept20	Oct20- Dec20	Jan21- Mar21	Apr21- Jun21	Jul21- Sep21
<b>Complaints received</b>	2	6	2	2	1	6
<u>Reason for complaint</u>						
<b>lack of response / communication</b>	2	1		2	1	1
<b>objects to outcome</b>	-	4	2	-	-	3
<b>lack of enforcement</b>	-	1	-	-	-	1
<b>complainant wrote to wrong address</b>	-	-	-	-	-	1

- 3.11 In conclusion, notwithstanding the challenges being faced by the team, performance is shown to be improving and the Implementation Plan and associated actions, as detailed in this report, are having positive effects on the service. Work will continue to be implemented as part of the improvement programme and as part of continual improvement measures (taking on board any national and local procedural and legislative changes that come forward in the planning sphere) within the team and Council-wide. The vital recruitment process is being progressed as a priority with the support of HR, as the additional resource is crucial to continue to improve performance and be more customer centric.



## Alternative Options

1. Stop Service- as it is a statutory function of Council to determine applications submitted under the Planning Acts this cannot be done.
2. Shared service or staffing - opportunities to share staff have been previously explored on a county-wide basis but overall lack of capacity and appetite from many Council's. Problems of recruiting are affecting other neighbouring authorities so sharing staff unlikely to be workable or viable.
3. Continue to engage consultants - not a cost-effective option plus this does not ensure consistency of approach nor service/team development, significant resource required to train interims, interims are less reliable and can cause instability in teams.
4. Reduce performance & quality of work – an option, however not one to be recommended as this could mean the Council is designated as non-performing and potentially have decision making powers removed from it. Also, important Council projects could be delayed and there would be reduced income and loss of reputation.

## Consultation

1. Internal parties including HR & Finance Officers
2. Leadership Team
3. Cabinet Members

## Financial Implications

Of already agreed revised Structure:

*Note: 20% refers to posts currently funded by the 20% uplift of planning application fees that have to be ring-fenced for planning purposes, therefore this funding is dependent upon income levels generated from application fees.*

	2021/22	2022/23	2023/24	2024/25	2025/26
Current	609,650	624,510	639,740	654,130	668,880
Current 20	63,950	65,230	66,550	67,880	69,250
20% Funding	(63,950)	(65,230)	(66,550)	(67,880)	(69,250)
	<b>609,650</b>	<b>624,510</b>	<b>639,740</b>	<b>654,130</b>	<b>668,880</b>
Proposed	830,660	847,490	864,630	882,120	899,960
Proposed 20	66,100	67,450	68,830	70,230	71,670
20% Funding	(66,100)	(67,450)	(68,830)	(70,230)	(71,670)
	<b>830,660</b>	<b>847,490</b>	<b>864,630</b>	<b>882,120</b>	<b>899,960</b>
<b>Additional Funding</b>	<b>221,010</b>	<b>222,980</b>	<b>224,980</b>	<b>227,990</b>	<b>231,080</b>

Notes:

- i. Assumes the potential apprentice role would be funded through a corporate budget as part of on-going discussions regarding apprenticeship appointments to the Authority.
- ii. The 20% refers to posts currently funded by the 20% uplift of planning application fees that have to be ring-fenced for planning purposes. Funding is therefore dependent upon income levels generated from application fees.

The financial investment will increase the annual funding gap and in the absence of additional income or savings being identified, will need to be funded by general reserves. The use of general reserves on an ongoing basis is not good practice and is not a sustainable approach. It will also mean that there would be less funding available to manage financial risks or invest in strategic priorities.

	<b>Actual and projected Spend against Cabinet approval additional budget in Sept 2021:</b>		
		<b>2021/22 projected</b>	<b>2021/22 YTD</b>
	Additional Budget Approved by Cabinet	221,010	221,010
	Forecast recruitment costs (approx./not confirmed):	5,000	0
	4 new posts assumed recruited March 2022	15,092	0
	Additional Market Supplements October 2021 to March 2022 for 2 posts	2,590	430
	Additional hours of current staff	6,765	1,756
	<b>Total projected costs to March 2022</b>	<b>29,447</b>	<b>2,186</b>
	Forecast additional agency costs to end of March 2022 (after vacancies and use of reserves)	37,170	32,535
	<b>Forecast underspend</b>	<b>(154,393)</b>	<b>(186,289)</b>
Approved by Section 151 Officer	Yes		
Legal Implications	1. No specific legal implications, however DM is a statutory service that assists the Council in meeting its obligations as local planning authority.		
Approved by Monitoring Officer	Yes		
Contribution to the Delivery of the Strategic Plan	1. In terms of District Council’s Strategic Plan 2020 to 2024 the proposals would contribute to shaping the place/District, in determining applications that support developments that preserve the districts characteristics and ensure sustainable development; encourage and support economic growth and promote the ability to be more customer responsive.		
Equality, Diversity and Human Rights Implications	1. There are no equality, diversity and human rights implications associated with implementing the recommendations.		
Crime & Safety Issues	1. There are no crime and safety issues associated with implementing the recommendations.		
Environmental Impact	1. The Development Management Service feeds into the implementation of agreed spatial policies as the work undertaken impacts upon the development and use of land in the district and associated with this the protection and enhancement of environmental assets.		
GDPR / Privacy Impact Assessment	1. No Privacy Impact Assessment has been undertaken as there are no GDPR implications relevant to the recommendation.		

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	Risk Description & Risk Owner	Original Score (RYG)	How We Manage It	Current Score (RYG)
A	More staff leave the authority due to strain of high workloads and poor morale.	Likelihood: Red Impact: Red Severity of Risk: Red	Commit to delivering service improvements and proposals set out in this paper.	Likelihood: Yellow Impact: Yellow Severity of Risk: Yellow
B	Sickness levels rise within the team	Likelihood: Red Impact: Red Severity of Risk: Red	Provide internal support from manager/HR/Counselling	Likelihood: Yellow Impact: Yellow Severity of Risk: Yellow
C	Not meeting NIs and subsequent designation as non-performing authority & loss of local decision-making	Likelihood: Yellow Impact: Yellow Severity of Risk: Yellow	Outsource work and/or bring in more consultants to support the team to help meet targets. Increase use of EoT agreement with applicants, if they are willing to enter into such.	Likelihood: Green Impact: Yellow Severity of Risk: Green
D	Need to return application fees if applications not progressed in timely manner	Likelihood: Yellow Impact: Yellow Severity of Risk: Yellow	Refuse applications without negotiating and encourage resubmissions; but likely to impact on appeal work.	Likelihood: Green Impact: Yellow Severity of Risk: Green
E	Delivery of Important and strategic projects delayed including Council priority projects and housing delivery	Likelihood: Yellow Impact: Yellow Severity of Risk: Yellow	Bring in interim support to lead on projects- although will increase budget spend and bring risks.	Likelihood: Green Impact: Yellow Severity of Risk: Yellow
F	Increase in complaints including to LG Ombudsman.	Likelihood: Yellow Impact: Yellow Severity of Risk: Yellow	Bring in interim support to lead on projects- more budget spend.	Likelihood: Green Impact: Yellow Severity of Risk: Green
G	Increase use and costs of interim support	Likelihood: Red Impact: Yellow Severity of Risk: Yellow	Fee levels negotiated to ensure best value where possible.	Likelihood: Yellow Impact: Yellow Severity of Risk: Yellow
H	Impact on Council reputation as a result of negative feedback and inability to meet customer demands	Likelihood: Yellow Impact: Yellow Severity of Risk: Yellow	Seek to manage customer expectations and prioritise work areas where demands are high or are felt of greater importance.	Likelihood: Green Impact: Yellow Severity of Risk: Yellow
I	Lack of qualified and skilled staff and poor decisions made increasing appeals and legal challenges	Likelihood: Yellow Impact: Yellow Severity of Risk: Yellow	Support and training provided to officers by managers and recruitment process	Likelihood: Green Impact: Yellow Severity of Risk: Yellow
J	Proposed market supplement levels are insufficient to address the recruitment and retention issues	Likelihood: Yellow Impact: Red Severity of Risk: Yellow	Understand nature of market and consider all factors that influence staff and potential staff in respect of employment with the Council.	Likelihood: Yellow Impact: Yellow Severity of Risk: Yellow

Background documents

Cabinet Report 7.9.21 item 8

Relevant web links	<a href="https://democracy.lichfielddc.gov.uk/ieListDocuments.aspx?CId=138&amp;MIId=1737&amp;Ver=4">https://democracy.lichfielddc.gov.uk/ieListDocuments.aspx?CId=138&amp;MIId=1737&amp;Ver=4</a>
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## Appendix 1: Improvement Plan Updates

## Appendix: Lichfield District Council Development Management Service Improvement Plan- updates

Issue/Theme	Action	Progress	By when	RAG	Comments
1. <b>There needs to be a clear protocol introduced that allows councillors to engage with/report issues to the planning service.</b>	i. Update protocols for Members & non-members of planning committee.	Protocols updated and planning webpages updated accordingly. Members notified.	Apr 21		Revised and updated protocols published and circulated.
	ii. Clarification of roles/responsibilities and lines of reporting- shared with all councillors.	Set up with Cllr Lax and on-going	Mar 21		Good communications in place between HoS, PDM and Cabinet Member and between PDM and Planning Committee Chair.
	iii. Communication through Portfolio holder & chairman of planning committee- set up regular/monthly meeting to discuss relevant issues between PDM & Portfolio Member including staffing matters or engagement issues on regular basis.	Quarterly sessions take place.	Jan 21		Member training undertaken & on-going
	iv. Planning Training for Members				
2. <b>The Council's Member code of conduct needs to be reviewed and obligations around 'civility' and 'bullying and harassment' added (as identified in the LGA's model code). The code should then be enforced robustly if subsequent breaches occur.</b>	<p>i. Role of Monitoring officer to reinforce – could consider further addition for engagement with planners to be included within Planning Committee &amp; Non-committee Members' protocol; as referred to above.</p> <p>ii. Clear reporting process to be put in place and all planning officers made aware of this, so all issues are reported and highlighted as soon as is possible and can be dealt with respectively by PDM and Monitoring Officer.</p>	Report on revised Code of Conduct considered by Audit and Standards Committee on 22 <sup>nd</sup> July. Resolved to consult on the revised version whilst awaiting outcome of a review by the Committee on Standards on Public Life.	Apr 21		<p>Protocols updated.</p> <p>Regular discussions held with Cabinet Member to reiterate importance of members treating officers with respect and understanding- good support provided in this regard.</p> <p>MO has intervened on occasions where they see fit to do so. Problems do remain at times, however with certain members conduct, but beginning to feel that better support being realised.</p>

<b>3. Mentoring or similar support should be made available to the PDM.</b>	<p>Secure necessary resource to support the development of the managers as regards their leadership skills.</p> <p>PDM needs more support on dealing with difficult issues within the team, so these can be resolved quicker going forward- with support from other managers.</p>	<p>PDM Mentor appointed &amp; regular meetings undertaken with mentor.</p> <p>Business Support &amp; Performance Officer being set up with coaching through West Midlands Employers coaching &amp; Mentoring hub</p>	Feb 21		<p>Part Complete in terms of the PDM- support provided by mentor and work has progressed and proved helpful in some areas. Mentor arrangement coming to conclusion.</p> <p>2x Team Leaders &amp; PDM on WM Employers management training programme for 2021/22 also.</p> <p>Outstanding –coaching hub have limited availability so proving difficult to progress.</p>
<b>4. Managers need to work with Planning Officers to ensure that officers receive greater emotional support and that their work is seen to be valued.</b>	<p>Stability and possibly additional resource needed within the team leader level, so greater officer support and development can be provided- review work responsibilities of the Principal team leader level within the existing structure against identified needs review (see also Recommendation 5 below).</p> <p>Number of development needs in the team to be addressed and more time set aside to assist and support more junior/inexperienced officers.</p> <p>Measures to be put in place to celebrate successes across the team.</p> <p>Review of PDRs and the process needed and greater/more regular 1 to 1 support put in place for officers by team leaders.</p>	<p>New Principal Planning Officer/Team Leader started April 21</p> <p>121s set up with TLs and regular/monthly full team meetings in place</p> <p>Smart phones &amp; lone working APP in place.</p> <p>Advised LDC are updating their lone working policy corporately at this time – now completed.</p> <p>Some in house training undertaken (conditions &amp; reports) and further training to be scheduled.</p> <p>Regular 121s are in place and clear communication of this continuing with new TL</p> <p>Additional team leader resource proposed within</p>	Apr 21		<p>Part complete/ ongoing:</p> <p>New Principal a welcome addition to the team, providing support to team members and PDM in her role. Staff morale improving as a consequence.</p> <p>PPO has however needed to take on caseload due to resource shortages and some members of team have a high need for support also- recruitment process to fill vacancies and new posts being progressed to ensure right level of management support in place within the team.</p> <p>In house training being provided and encouragement to all to attend external training sessions to meet CPD needs. Also, 1 junior member of team on 2<sup>nd</sup> year of a day-release University course to gain a planning qualification.</p>



		<p>DM review so less reportees per manager to help with the support to team members.</p> <p>All of DM team members have had a completed PDR by end of Sept 2021.</p>			<p>Structure agreed &amp; includes this additional resources at team leader level. Recruitment to be initiated.</p> <p>All members of the team had PDR undertaken by end of Sept 2021 &amp; returned to HR.</p>
<p>5. <b>A review of management responsibilities within the team should be undertaken to ensure that the PDM has capacity to perform their leadership role and adequate management resource available to support the more junior staff.</b></p>	<p>Confirmation of understanding of current sign-off protocols needed by all team members.</p> <p>Review of resource at principal/ team leader level needed required to understand workloads, responsibilities and whether resource inputs are correct.</p> <p>Identify suitable management development opportunities for managers.</p>	<p>Salary benchmarking commissioned and completed- findings and recommendations fed into a structural review for DM approved at September Cabinet. ELG have also considered and agreed this. Posts to include from 1.10.21</p> <p>Interim Planning Officer resource brought in inc 1 PO &amp; 1 PPO interim to remain, further resource needed to cover vacancies however and interim support have proved difficult to find at Senior level</p> <p>In place- PDM &amp; 2x PPO/TLS on the in-house management training course.</p>	<p>ASAP</p> <p>Apr 21</p> <p>Mar 21</p>		<p>Part Complete</p> <p>Post Cabinet agreeing investment in service, MS added to relevant posts from Oct 2021 and 2 temporary posts made permanent. Also work underway on recruitment process; JD/PS written &amp; job evaluated. Discussions with HR and external organisations undertaken to take a different/ approach to recruitment. Aiming for adverts to go external before the end of Nov 2021.</p> <p>PDM &amp; 2 TLs on management course in 2021/22</p>

<p><b>6. There needs to be improvement in mechanisms to keep customers (and councillors) up to date with the progress of applications as well as the introduction of regular developer/agent forums where performance issues raised can be explored and professional relationships enhanced.</b></p>	<p>Reiterate to officers within the service the need to keep applicants, members and other interested parties abreast of the progress of planning applications. Need for consistent approach by all in this regard.</p> <p>Ensure members clear who and how to contact officers dealing with applications on the basis of the previously agreed approach (i.e. where the name of a case officer is known then contact that officer, where not known contact either the Planning Application TL, PDM or the Business Support and Performance Officer (also see Recommendation 2 above).</p> <p>Re-introduce Developer/Agent forums and use these to share information and make service improvements.</p>	<p>Need to keep customers abreast of progress with applications reinforced at team meetings and messaging from team leaders and PDM.</p> <p>Identified top list of agents in terms poor quality submissions- to be targeted direct- First Agents Forum held 14.7.21 to continue on a quarterly basis/next programmed for Oct 21. Positive/constructive feedback session; well received by all involved; though 6 agents of 16 invited attended.</p>	<p>End Feb 21</p> <p>Apr 21 and every 3 months</p>		<p>Work ongoing and progressing well:</p> <p>Emerging evidence of cultural change within the DM service following training and engagement from PDM &amp; other managers. Officers seeking to keep residents and members up to date on applications/ case progression. Also, seek to respond to e-mails in good time; workloads allowing.</p> <p>Notes added to standard email and website to inform customers of high workloads and delays that may be experienced at this time.</p> <p>Agents Forum undertaken in August but only 2 people were due to attend Forum in October so this had to be cancelled due to lack of interest- newsletter to be sent instead in replacement and views sought on form of engagement preferred with agents.</p> <p>Improved communications and relationships between the service and agents. Recognition of the pressures on the service and greater understanding, equally on the part of officers' acknowledgment of the issues faced by agents/applicants from receiving a poor service.</p> <p>Service contacts details updated on website.</p>
<p><b>7. Staff training around customer responsiveness should be provided to ensure that this is embedded as a fundamental part of a Planning Officer's role.</b></p>	<p>Build upon the previous training and development sessions led by the Council's HR function in this area.</p> <p>Roll out of final Customer Charter for DM &amp; ensure all new team members are clear on the expectations for customer</p>	<p>Customer Charter adopted, circulated &amp; on website</p> <p>Key messages around customer care and customer service ethos shared at team meetings and through training</p>	<p>Apr 21</p> <p>Mar 21</p>		<p>Work ongoing and progressing well:</p> <p>PDM undertook training for the team on customer responsiveness as reminder of customer charter targets and need to keep customers informed of any delays/ better customer responsiveness</p> <p>Officers regularly updated at Team Meetings of importance of good customer responsiveness.</p>

	<p>engagement so consistent approach across the team adopted.</p> <p>Importance of customer care to be embedded within team and also training on dealing with difficult customers needed- with support from HR training and development officer.</p>	<p>sessions with officers. Reinforced as part of regular team meeting agendas.</p>	Mar 21		<p>Officers are acknowledging more the importance of maintaining a good relationship with applicants and agents as well as those parties who may be commenting on proposals in their locality.</p> <p>Some improvement has occurred in this area.</p> <p>See above re Agents Forum- undertaken and Customer Charter highlighted as part of this.</p>
<p><b>8. Options for greater career progression should be explored including wider use of career grades and a review of Planning Officer salaries.</b></p>	<p>Commission a piece of work from the West Midlands Employers to assess salary levels for planning officer roles at comparable Council's and review the results. As part of this work include reference to career progression and associated pay grades at other local authorities and review LDC model in light of this.</p> <p>Review Planning Development Manager Salary level + Market Supplement</p>	<p>Salary benchmarking exercise by HR consultant &amp; results fed into review of DM structure and pay levels. Approved structure now includes reduced career-bandings for planning assistant roles and Market Supplements attached to PPO posts.</p> <p>Cabinet approval for revised structure Sept 2021. MS notified to ELG. Review completed and MS increased May 2021.</p>	Sep 21		<p>Complete</p> <p>Following benchmarking exercise and Cabinet approval. JD/PS updated; closed planning assistant career posts; market supplements added to PPO posts from Oct 2021</p> <p>Advertising new and vacant posts – await to see response from the market.</p>
<p><b>9. The Planning Enforcement Plan should be reviewed, then communicated to Councillors to</b></p>	<p>Review the current Enforcement Plan and ensure service standards are up to date.</p>	<p>Ongoing work on this. Additional enforcement capacity and restructured</p>	Mar 21		<p>In progress:</p>

<p><b>be fully aware/manage expectations.</b></p>	<p>Publicise the new Enforcement Plan to officers, members and wider stakeholders including local residents.</p> <p>Fill the existing vacant Principal Planning Enforcement Officer post and review level/nature of resource in the wider team pending the planned retirement of the current Enforcement Assistant in 2021/22.</p>	<p>team included in DM service proposals approved by Cabinet Sept. Recruitment to new/revised posts due to commence shortly. Contracts for interims extended.</p> <p>Enforcement Plan being reviewed.</p> <p>Revised structure introduced to increase Enforcement officer resource by 1 post.</p>			<p>Current Interim support update – PPO has agreed to extend working with LDC post December 2021. Also, additional temporary, part time consultant support introduced for 3 months to progress paperwork on more complex cases.</p> <p>Member training on Planning Enforcement to take place in December 2021 &amp; Enforcement Plan updates to form part of this.</p>
<p><b>10. A light touch review of the validation checklist should be undertaken, and greater clarity provided for both Business Support staff and Planning Officers around expectations and where responsibilities lie in agreeing the information necessary to support applications.</b></p>	<p>Complete the review of the business support validation function and implement the proposals arising out of this – this should clarify responsibilities between the business support team and the roles of planning officers and provide the necessary capacity and capabilities within the business support team to effectively carry out the required work.</p> <p>The Validation Checklist is programmed to be updated, as is required every 2 years.</p>	<p>Light touch review of LV guidance completed Feb 2021- TS team training being undertaken.</p> <p>Feedback from Agents forum on validation to be taken on board.</p> <p>All TSO posts now filled and team operating better with training and development advancing well. Validation targets now being met.</p>	<p>Apr 21</p> <p>Feb 21</p>		<p>Action Completed</p> <p>Validation guidance updated. Team restructuring has gone well with new appointments settling in to their roles. Team seem motivated and there is clear evidence of improved performance with validation &amp; registration of applications meeting the charter target.</p> <p>Agents Forum updated of validation requirements.</p> <p>Validation Customer Charter targets being met.</p>
<p><b>11. Improvements to the office accommodation to enhance staff working conditions and to portray a better image to visitors. This should include ideas to make the</b></p>	<p>Pending any corporate decisions regarding the DCH, some changes have been undertaken to the facilities available to staff e.g. provision of new kitchen facilities. In addition the planning offices are</p>	<p>Main planning office painted &amp; new tech kit and lighting. Ceiling works undertaken. Declutter of offices also undertaken and ongoing.</p>	<p>Mid 21</p>		<p>Some work completed but action superseded by corporate plans to reconfigure office space at DCH in line with agile working model.</p>

<p><b>Council Chamber less intimidating for presenting officers.</b></p>	<p>due to have a repaint shortly and be re-configured to accommodate returning staff post Covid lockdowns.</p> <p>In terms of the Council Chamber it is proposed to review the present meeting arrangements and see how improvements can be made to help staff, the committee and members of the public.</p> <p>Re-consider seating arrangements in discussion with Chairman of Committee when in office Council Chamber meetings resume- this could include moving chairman and officers to same level as rest of the audience and members rather than at the current raised position. As Chamber is a listed building and no other large room available alternative accommodation not possible at this time.</p>	<p>Proposed corporate changes re. NWOW will likely have impact.</p> <p>Chair of Committee preferred to be at a physically raised level.</p> <p>No further progress possible at this time- requires input from other departments' inc facilities management.</p>			<p>Planning Committee continues to be held in the Council Chamber due to space needed and no alternative option- but operating fine on this basis.</p>
<p><b>12. A review of the effectiveness of S106 processes should be undertaken with particular emphasis on how the legal input might be improved and speeded up.</b></p>	<p>Review the legal arrangements surrounding S106 arrangements and if necessary raise with the Partnership Board.</p>	<p>Resource in SS legal and Governance team causing issues for team. SS legal slow to progress still. Matters discussed with legal/SS especially with regard to time involved in processing Unilateral Undertakings</p> <p>Temporary dedicated planning resource brought in to the SS legal service and proposals to increase planning capacity in new</p>	<p>May 21</p>		<p><b>In progress:</b></p> <p>Corporate proposals being considered at the present time to enhance the shared legal service arrangement led by South Staffordshire Council. If agreed and additional investment made this would provide for more dedicated planning resource to be employed in support of the service.</p> <p>Replacement legal officer now in post at SS legal and responsiveness to instructions has improved recently.</p>

		<p>structure (subject to approval and increased financial contributions from partners).</p> <p>Process slow; clarification of roles/responsibilities needed between in house governance team &amp; SS legal. Once new legal team in place more work could continue on this. Within the DM team the message about clear instructions to legal has been reiterated.</p>			<p>Some work with in house process for dealing with legal agreements needs further work- on work stream for team.</p> <p>Need for extra sign-off by HoS before legal agreements can be completed, can add delay at times.</p>
<b>13. Review IT challenges facing the service</b>	<p>DM service requires robust and resilient ICT to function properly. Problems have been identified as regards the stability of network, access issues to key programmes, mobile technologies not working. These issues need rectifying particularly with the introduction of agile working and communications being a vital component of service delivery. Meetings held with HoS and IT Manager to identify issues and agreement to IT Manager investigating the basis for the problems flagged up.</p>	<p>Meetings taking place with IT in terms of looking at the issues. Some areas of improvement have started to be looked at recently.</p> <p>IT has resolved some of the issues raised with them and investigating the causes of and possible solutions to others. On-going dialogue between IT and DM.</p>	Dec 21		<p><b>In progress:</b></p> <p>Key issue of priority/focus is support from IT and having the right software &amp; hardware in place for the team.</p> <p>DM colleagues are reporting all problems as soon as they occur, but ongoing issues still occurring for members of the team.</p> <p>Uniform &amp; other IDOX upgrades end of November and thereafter – this may provide some fixes.</p> <p>Business Support &amp; Officer has meetings and receives updates from IT Manager.</p> <p>Back scanned files now uploaded to the teams DMS making some information more accessible.</p>
<b>14. Review relationship between Development Management Service and Customer Services to identify where pressures can be</b>	<p>There is scope to reduce pressures on planning officers and technical support staff in DM with customer services fielding enquiries and assisting in communicating</p>	<p>Officer appointed in Corporate Services to review processes and identify potential new ways of working.</p>	Dec 21		<p><b>In progress:</b></p> <p>Working group set up – led by Head of Customer Services to see how customer services can support the DM meetings being undertaken -</p>



reduced on the former together with other service improvements.	progress with planning applications, the latter based on IT systems.	Work stream under way examining nature of enquiries received by Customer Services and consideration as to how these could be addressed at first point of contact going forward. As part of this work also looking at how IT systems or standard FAQs can help inform responses to questions about progress of planning applications.			next meeting due 26/11/21 inc review of post distribution and better use of website.
15. Identify scope for providing more information to customers on the expected DM experience to aid understanding	Need to improve the quality of information on planning webpages and keep these up to date, as well as looking at other potential mediums. Such information would also assist in managing expectations and hence pressures on the service.	Initial audit undertaken of website and now that TSO team at full complement further work on this can now be progressed. See comments re 14 above- working with others to see what information can be presented on the website. Additional contact details have been added to website.	Dec 21		In progress:  Part of the above/see point 14
16. Linked to 9. above, explore options for boosting interim enforcement capacity	Council currently is reliant on some interim resources to help deliver enforcement, pending recruitment to the recently approved revised structure. Even with this resource there is pressure on the service with a significant caseload. There is an opportunity here to see if additional temporary resource could be brought into the service to complement and bring the	Have interim enforcement officers supporting the team including 1 PPO (approx. 32 hours) level and 1 SPO (approx. 8 hours) doing site visits.  Caseload is coming down and old cases are steadily starting to be cleared but some cases/sites are	Dec 21		<b>In progress:</b> See update above under item 9.  Agreement to new structure made- due to go out to external advert by end of Nov.  Interim support extended to process paper work.

	number of outstanding cases down.	taking up a lot of resource & time due to the complexity and/or high customer engagement needed.			
<b>17. Identify scope to utilise dedicated temporary resources to reduce application caseloads</b>	Caseloads for individual planning officers is high. The DM service would benefit if temporary resource could be brought in to reduce caseloads by dealing with specific kinds of application.	Team is down by approx. 1.5 posts currently even with interim support. Proving difficult to source suitable interim senior support, as shortage with consultants at this level. Exploring alternative options.	Dec 21		<b>In progress:</b> Proving difficult to obtain further interim support at SO/PPO level due to limited availability of candidates. Interviews held but on making offer of contract candidates pull out. Exploring options regarding recruitment of a planning organisation/meetings being held in this regard.

## Review of Shared Legal Services

Cllr Angela Lax, Portfolio holder for Regulatory, Housing and Health

Date:	7 December 2021
Agenda Item:	7
Contact Officer:	Christie Tims, Head of Governance & Performance
Tel Number:	01543 308002
Email:	<a href="mailto:Christie.tims@lichfielddc.gov.uk">Christie.tims@lichfielddc.gov.uk</a>
Key Decision?	NO
Local Ward	n/a
Members	



**CABINET**

### 1. Executive Summary

- 1.1 To highlight to Cabinet the challenges faced regarding staffing within the South Staffordshire Shared Legal Service, explore options available and seek approval for additional resources to deliver the recommended approach.

### 2. Recommendations

- 2.1 To approve an increase in the annual contribution from **£115,200** to **£145,300** to the South Staffordshire Shared Legal Service for 2022/23 and for the remainder of the agreement up to 31 December 2024 as shown in the financial implications section.
- 2.2 To approve that budgetary growth totalling **£84,300** for the remaining agreement period (3 years), together with an increase in the base budget at this higher level beyond the agreement, is included in the Draft Medium Term Financial Strategy for approval by Council on 22 February 2022.

### 3. Background

- 3.1 In November 2019 Cabinet gave approval for the establishment of a shared legal service and in January 2020 the Shared Legal Service between South Staffordshire Council (host), Lichfield District Council and Tamworth Borough Council commenced.
- 3.2 The original structure for the service is as follows:
- 1 x full time Planning Solicitor (acted as Lead Lawyer)
  - 1 x full time Litigation Solicitor (acted as Deputy Monitoring Officer)
  - 1 x full time Property Solicitor
  - 1 x part time Contracts/Commercial Solicitor
  - 1 x part time Legal Assistant
- 3.3 In early 2021 South Staffordshire District Council (SSDC), recognising the increasing workload and likely need for further resources within the legal team, and in furtherance of their wider apprentice programme, supported a proposal to introduce a Legal Apprentice post to be funded from an earmarked reserve for a 2-year period. Since then there have been further resignations resulting in on-going vacancies and as a consequence, significant issues in maintaining the quality of service set out in our original agreements.

- 3.4 With almost 2 years of the 5 year agreement for the Shared Service undertaken, it is clear that the current structure is no longer fit for purpose and is unsustainable in the long term given the volume of legal work being requested from the team. When the Shared Legal Service was established, there was an underestimation of resources required due to the dispersed nature of legal work within the individual councils. This was masked by Covid to a certain extent, but now that levels are returning and the housing and property markets are recalibrating the team are constantly struggling to meet deadlines and provide a quality, timely service. This in turn is leading to an increased churn in key positions.
- 3.5 In discussion with other Councils and legal services providers, the Shared Service is not unique in this respect. Across the board all legal sections are struggling to recruit to planning, property and contract positions and existing teams have found significant increases in their workload over the last year in particular. Our use and reliance on the legal service has also increased greatly over the last 18 months as more experienced officers have left the organisation and we deal with ever more complex and challenging questions and projects requiring increasing legal input.
- 3.6 Feedback from all three authorities has been generally positive and supportive for the legal work in the large throughput areas – though timeliness of responses and communication remain areas of concern due to resourcing issues. There have been a number of specific service issues, largely due to staffing changes and vacancies and the delay in developing key processes to underpin the volume of work. Satisfaction with the quality of advice provided is generally high; it is the timeliness of advice that often causes issues. This has not been helped by a high staff turnover within the service and the resultant use of locums. Recruitment to the current vacant positions is nearing completion and it is anticipated that this will assist with service delivery going forward.
- 3.7 The service also currently has one planning Solicitor seeking to service three planning committees which meet on a monthly basis; this is unrealistic and does not support work-life balance. It is proposed to introduce a second planning solicitor post to the team to address capacity and resilience issues in this key area where volumes of work are increasing. Planning is a significant client area across the three authorities, often requiring speedy advice on time critical matters.
- 3.8 Due to capacity issues within the team, there is a need for the Director at South Staffs to undertake legal advice work which is not best use of resources and restricts available time to undertake the post holder's substantive role. This is mirrored in Lichfield with the Head of Governance & Performance (Monitoring Officer) also being frequently engaged in chasing advice and escalating responses from the service, capacity that is more usefully employed elsewhere.
- 3.9 The introduction of a Legal Services Manager position would remove direct line management responsibility from Director/HOS level and would enable some governance/general local government legal advice to be undertaken at Solicitor level. This would be a better use of resources and would again increase resilience within the team, therefore meeting a key aim for all three authorities of providing a robust oversight of governance and consistency of advice. A Team Manager position would enable greater oversight of day to day operations and enhanced client liaison and ensure work is properly co-ordinated. This would enable capacity within the service to develop, imbed and improve processes to eliminate service issues.
- 3.10 The proposed legal team going forward is:
- Legal Services Manager (**new post**)
  - 1 x full time Planning Solicitor (existing post)
  - 1 x full time Litigation Solicitor (existing post)

- 1 x full time Property Solicitor (existing post)
- 1 x part time Contract/Commercial Solicitor
- 1 x full time Planning Solicitor (**new post**)
- 1 x Legal Assistant (existing post but increased hours)

The additional cost of the above (against current budget) is approximately £99,000 per annum. The shared service is based on an equal cost share across all three authorities. Each authority would therefore be asked to increase their contribution from the current £115,200 per annum to £145,300 for 2022/23 plus any annual inflationary increases as per the shared service agreement for the remainder of its term. This is still significantly less than the £178,000 previously spent on legal services in the year prior to the establishment of the service.

- 3.11 To support the ongoing development of the service a temporary post holder has been appointed by SSDC to develop a plan to improve procedures to increase efficiency resulting in increased capacity for fee earners and improvements in service responsiveness. They have also recommended a series of joint training sessions to improve the quality of instructions provided by officers to the service to increase efficiency and reduce delays in clarifying instructions.
- 3.12 The further proposed increased capacity within the team, whilst solving the current issues, may also open up the opportunity of undertaking work for additional clients in future. The service is often asked to provide legal work, but at the moment does not have the capacity. Any additional income generated would be ring-fenced to the service. Further work is required to stabilise the service to be able to predict the potential additional income this would generate. Such income would be monitored via the Governance board, with reductions to each parties contributions being made as these become clear to enable the service to become more sustainable.

## 4. Other Options

4.1 Soft market testing for alternative models indicate that significant further additional funding would also be required to reinstate an entirely in-house own legal team or in order to secure an alternative provider as demonstrated by the other options to continuing with the shared service.

Option	Areas Covered	Benefits	Risks	Costs
Bring legal services back in-house	A single area of specialism (i.e. planning)	Legal advice under our control and involved in day to day activity of the council. Available for immediate response (subject to leave and other commitments)	Single point of failure and normally only specialist in single area of law – external legal spend would also be required in addition as before. TBC unable to recruit to lone solicitor position via two recruitment exercises.	£80k costs (salary on cost and CPD) for single lawyer and additional admin support to co-ordinate activity.  £90k external legal spend for current levels of legal work.  <b>Min £170,000 (prior costs £178,000)</b>
Alt Council provider 1	Land transactions and conveyancing & Employment	Established legal team – already have relationship and	No domestic planning expertise or capacity.	£90 to £115 per hour for services covered – Approx. £70k per annum.

	pension matters Contracts General Litigation Charities& trusts Individual rights Highways Countryside and rights of way	responsive service – current response time 3 weeks.	No onsite capacity – no continuity of officers for key areas to support our work areas – whoever is available.  Co-ordination of key areas of law required at LDC.	External commission for all other areas at EM Lawshare rates – approx. £60k per annum.  Co-ordination role approx. £40k  <b>£170,000</b>
Alt Council provider 2	Land transactions and conveyancing Employment & pension matters Contracts General Litigation Charities& trusts Individual rights Highways Countryside and rights of way	Established legal team.  45 solicitors – would need to buy in capacity to support expansion to include our areas of law.	No planning expertise or capacity – planning advice provided by Anthony Collins via EM Lawshare. Currently no property lawyers in house. No onsite capacity – no continuity of officers for key areas. Have experienced rapid withdrawal from agreements by this authority previously. No experience of providing 3 <sup>rd</sup> party legal support.	£90 to £115 per hour for services covered – Approx. £40k per annum.  External commission for all other areas at EM Lawshare rates – approx. £80k  Co-ordination role approx. £40k  <b>£160,000</b>
Use E.M. Law share	Specialists in all areas of local government law available	Specialists in all areas of law available	Co-ordination of this would be a full time role for a legal co- ordinator at LDC. No consistency of advice.	Rates vary from approx. £70 to £175 per hour  Approx. £125k in legal spend plus £40k for co- ordinator role.  <b>£165,000</b>
Commission separately	Specialists in all areas of law available	Specialists in all areas of law available	Co-ordination of this would be a full time role for a legal co- ordinator at LDC. Costs and responsiveness will be subject to market forces. No consistency of advice.	Co-ordination role approx. £40k Estimate £200k legal spend.  <b>£240,000</b>
Other districts	No current appetite or capacity to host or develop shared service.			

Alternative options to investing in the shared legal service increase costs from approximately £160k to £240k per annum.



Alternative Options	<p>Section 4 outlines costs and risks of alternatives to ensuring the sustainability of the Shared Legal Service.</p> <p>If the request for additional funding is not approved the partnership would need to review the sustainability of the shared service which would result in considerable officer time (the Head of Governance &amp; Performance) being spent on dissolving the partnership and sourcing or recruiting any alternative provision.</p> <p>Expected increase in costs to between £160k and £240k per annum based on current volumes of work.</p>																																																					
Consultation	<p>Consultation has been undertaken within leadership team and partners.</p> <p>Service feedback from customer satisfaction reviews have been taken into account.</p>																																																					
Financial Implications	<p>The projected financial implications of this proposal compared to the Approved Budget are shown for the agreement period and beyond assuming the expenditure level continues using the same assumptions:</p> <table><tr><th rowspan="3">Details</th><th colspan="4">Agreement Period to 31/12/2024</th><th colspan="2">Further Projection</th></tr><tr><th>2021/22</th><th>2022/23</th><th>2023/24</th><th>2024/25</th><th>2024/25</th><th>2025/26</th></tr><tr><th>£</th><th>£</th><th>£</th><th>£</th><th>£</th><th>£</th></tr><tr><td colspan="7"><u>Shared Legal Service</u></td></tr><tr><td>Approved Budget</td><td>112,940</td><td>115,200</td><td>117,500</td><td>89,900</td><td>29,950</td><td>122,250</td></tr><tr><td>Recommended Budget</td><td>112,940</td><td>145,300</td><td>148,200</td><td>113,400</td><td>37,800</td><td>154,200</td></tr><tr><td rowspan="2">Budgetary Growth</td><td>0</td><td>30,100</td><td>30,700</td><td>23,500</td><td>7,850</td><td>31,950</td></tr><tr><td colspan="4">84,300</td><td colspan="2">39,800</td></tr></table> <p><i>Assumes annual inflation of 2%</i></p>	Details	Agreement Period to 31/12/2024				Further Projection		2021/22	2022/23	2023/24	2024/25	2024/25	2025/26	£	£	£	£	£	£	<u>Shared Legal Service</u>							Approved Budget	112,940	115,200	117,500	89,900	29,950	122,250	Recommended Budget	112,940	145,300	148,200	113,400	37,800	154,200	Budgetary Growth	0	30,100	30,700	23,500	7,850	31,950	84,300				39,800	
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Approved by Section 151 Officer	Yes																																																					
Legal Implications	<p>The shared legal service provides the following legal services:</p> <ul style="list-style-type: none"><li>• Planning – policy, development management, enforcement, trees and conservation protection advisor to planning committee, CIL &amp; S106</li><li>• Regulatory – including licensing</li><li>• RIPA</li><li>• Property - Leases, minor disposals and acquisitions</li><li>• Local Government Law</li><li>• Election Law</li><li>• General contracts and procurement activity</li><li>• General advice on data protection and freedom of information</li><li>• Coordination and oversight of legal activities and consistency of advice in support of the Monitoring Officer</li><li>• Commissioning of external instructions</li></ul> <p>The service does not directly support complex commercial property, regeneration and development agreements, footpaths and rights of way, complex contract law, company law, employment law and financial services law including taxation etc. for which separate arrangements exist.</p>																																																					

Approved by Monitoring Officer	Yes
Contribution to the Delivery of the Strategic Plan	Sound legal advice and support underpins the work of the Council. It is critical to ensure all strategic ambitions are achieved in compliance with our legal obligations.
Equality, Diversity and Human Rights Implications	Not applicable
Crime & Safety Issues	Not applicable
Environmental Impact	This service largely operates remotely, limiting requirements for travel.
GDPR / Privacy Impact Assessment	Not required – covered by the agreement

	Risk Description & Risk Owner	Original Score (RYG)	How We Manage It	Current Score (RYG)
A	Lack of commitment from partners to continue with partnership	Yellow Likelihood (Green) Impact Assessment (Yellow)	All partners have explored other options and host authority and TBC have reaffirmed their commitment to the shared service.	Green Likelihood (Green) Impact Assessment (Green)
B	The investment does not result in improvements to the service	Red Likelihood (Yellow) Impact Assessment (Red)	Performance metrics are set out in the agreement and governance arrangements hold the host authority to account. Additional feedback from clients to be sought and monitored to ensure performance improvement. Investment into supporting effective usage of the service.	Yellow Likelihood (Green) Impact Assessment (Yellow)
C	A partner subsidises the others' legal work	Yellow Likelihood (Green) Impact Assessment (Yellow)	Cost sharing is set out in the agreement. Regular budget monitoring ensures equal share. Future plans should provide offset of costs for all partners.	Green Likelihood (Green) Impact Assessment (Green)
D	Recruitment and staffing issues	Yellow Likelihood (Yellow) Impact Assessment (Yellow)	A dedicated service manager and improvements in capacity/work life balance for key posts will make them more appealing roles and enable effective support to be provided to the team. Structure now includes capacity for succession planning.	Yellow Likelihood (Green) Impact Assessment (Yellow)
E	Team is unable to cope with workload / urgent instructions	Red Likelihood (Yellow) Impact Assessment	Ensure instructing officers are supported to maximise the impact from legal advice and input. Establish better relationships to manage flow of work and planning	Green Likelihood (Green) Impact Assessment

		(Red)		(Green)
F	One party wishes to leave	Yellow Likelihood (Green) Impact Assessment (Yellow)	The agreement sets out a clear mechanism for this. LDC is positioned with a clear exit strategy and succession planning for alternatives to ensure minimum disruption, however would incur additional costs.	Green Likelihood (Green) Impact Assessment (Green)
G	Dispute between partners	Yellow Likelihood (Green) Impact Assessment (Yellow)	Regular communications and clear escalation and resolution path detailed in the agreement. Good working relationships maintained.	Green Likelihood (Green) Impact Assessment (Green)
H	Team is given workload beyond its capacity	Red Likelihood (Yellow) Impact Assessment (Red)	Input from all HOS to longer term planning for the service to support corporate ambitions in terms of volume of work and nature of work required.	Yellow Likelihood (Green) Impact Assessment (Yellow)
I	Higher inflation than estimated	Yellow Likelihood (Yellow) Impact Assessment (Yellow)	Inflation is assumed at 2% per annum in the modelling. However an allowance for higher inflation is included in the minimum level of reserves. In light of the current economic climate, the current level will be reviewed as part of the drafting of the updated Medium Term Financial Strategy.	Yellow Likelihood (Yellow) Impact Assessment (Green)

#### Background documents

[The Establishment of a Shared Legal Service](#) – Cabinet Nov 2019

#### Relevant web links

[Options for legal services – advantages & disadvantages](#)

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