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Tuesday, 11 September 2018

Dear Sir/Madam

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

A meeting of the Economic Growth, Environment and Development (Overview & Scrutiny) Committee has been arranged to take place **WEDNESDAY, 19TH SEPTEMBER, 2018 at 6.00 PM IN THE COMMITTEE ROOM** District Council House, Lichfield to consider the following business.

Access to the Committee Room is via the Members' Entrance.

Yours Faithfully

A handwritten signature in black ink, appearing to read 'Neil Turner'.

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

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

Councillors Cox (Chairman), Ball (Vice-Chair), Warfield (Vice-Chair), Mrs Baker, Drinkwater, Mrs Eagland, Mrs Fisher, Marshall, Smith and Mrs Stanhope MBE



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AGENDA

1. Apologies for Absence
2. Declarations of Interest
3. Minutes of the Previous Meeting 3 - 6
4. Presentation by the Environment Agency
5. Proposal for a Small Business Grant Scheme 7 - 18
6. Local Plan and Related Spatial Policy Matters Update 19 - 268
7. Work Programme 269 - 272



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

20 JUNE 2018

PRESENT:

Councillors Cox (Chairman), Drinkwater (Vice-Chair), Mrs Eagan, Mrs Evans, Mrs Grange, Marshall, Warfield and Mrs Stanhope MBE.

(In accordance with Council Procedure Rule No.17 Councillor Wilcox attended the meeting).

17 APOLOGIES FOR ABSENCE

Apologies were received from Councillors Mrs Baker and Mrs Fisher. The Cabinet Member, Councillor Pritchard also gave his apologies and Councillor Wilcox attended in his place.

18 DECLARATIONS OF INTEREST

There were no declarations of interests.

19 MINUTES OF THE PREVIOUS MEETING

RESOLVED: That the minutes of the meeting held on the 14th March 2018 as circulated be approved as a correct record and signed by the Chairman.

20 TERMS OF REFERENCE

The terms of reference for the Committee were circulated as a reminder of their role.

RESOLVED: That the Terms of Reference as taken from the Lichfield District Council Constitution be noted.

21 WORK PROGRAMME

The Committee discussed the work programme for the forthcoming year and it was reported that in addition to what had been circulated, it had been organised to have the Environment Agency attend the September meeting to discuss their rational regarding giving planning application representations.

Member then requested an item on back land development policies as many applications had come forward recently and it was agreed that the Chairman would discuss this further with Officers.

It was then requested to have an initial briefing paper on performance of self builds in the district as the government were encouraging this. It was reported that there was a Council register that helped match interest to opportunities and so data could be reported.

It was noted that the Chairman and Vice-Chairmen would be meeting with the Cabinet Member to discuss forthcoming items where the Committee could assist and have an input. Members were encouraged to forward any ideas for the work programme to the Chairman.

RESOLVED: That the work programme be noted and amended as agreed.

22 LOCAL PLAN UPDATE

The Committee received a report giving an update on the Local Plan and related spatial matters. It was reported that the Local Plan Allocations document had now been submitted to the Planning Inspectorate and was now awaiting an Examination date. It was then reported that the consultation on the Local Plan Review Scope had concluded with around 1000 comments received which were now being analysed by Officers with a report being brought to Members in due course.

The main area of discussion was centred on the Greater Birmingham Housing Market Area Housing Shortfall and the Strategic Growth Study report that had been commissioned by the 14 Local Authorities that make up the Birmingham Housing Market Area and prepared by GL Hern and Wood. It was expressed that the study did not recommend numbers of housing to be allocated to each area but an aid to help communications between all the authorities and ensure the any development was right for the area with adequate infrastructure.

Members had concerns on the impact on the greenbelt and blurred boundaries with other areas and felt the report implied that it should be built on before other sites as the easier option. The Committee also sought reassurance that Birmingham City Council had considered all available brownfield sites had been considered. It was reported that not all sites within Birmingham would be allocated for housing or indeed suitable for housing and some might be for employment uses. It was confirmed that the independent study had verified the number of houses required to meet Birmingham's housing supply. It was also reported that from the study, this housing number shortfall had reduced by 10k and with the scope of high density housing, this could reduce even further.

Members felt that infrastructure was already stretched in the Lichfield District area and this would have to be addressed before any major development occurred.

There was further concern that the study was based on a date range up to 2031 and would set a standard of taking on housing beyond this date.

It was noted that there was an Officer Steering Group for the whole 14 authorities and a position statement would be published in the near future.

There was some discussion requesting an update to the Brook Hay/Twin Rivers site and it was noted that there had been some interest by developers and although not including in the Local Plan, was mentioned by the Inspector during examination and was a reason why a Local Plan Review was beneficial.

It was noted that Neighbourhood Plans would be progressing to referendums soon.

RESOLVED:

- (a) That the progress associated with the Local Plan Allocations and Local Plan Review be noted;
- (b) That the issues surrounding the Greater Birmingham Housing Market Area Housing Shortfall and the Strategic Growth Study be noted;
- (c) That the proposal to update the Council's Statement of Community Involvement be noted; and
- (d) The recent progress in relation to neighbourhood plans within Lichfield District be noted.

(The Meeting closed at 7.07 pm)

CHAIRMAN

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Proposal for a Small Business Grant Scheme

Cabinet Member - Cllr Ian Pritchard

Date: 19th September 2018

Contact Officer: Jonathan Percival

Tel Number: 01543 308149

Email: jonathan.percival@lichfielddc.gov.uk

Key Decision? YES

Local Ward Members All



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

1. Executive Summary

- 1.1 This report proposes the introduction of a small business grant scheme across Lichfield District. It outlines the proposal and criteria for a scheme, to award up to 50% grant funding ranging from £500 to £1,500 to a qualifying existing business which has been trading for no more than three years or alternatively to persons looking to start a business in Lichfield District.

2. Recommendations

- 2.1 That the Committee notes the proposal and recommends to the Cabinet that it be approved and implemented.

3. Background

- 3.1 Via principally its economic development service, Lichfield District Council works with strategic partners including other local authorities to provide support for existing businesses and those who strive to set up a business within the district. The support on offer comes in a range of forms, covering all stages of a business' life, from the germ of a business idea to expansion.
- 3.2 Alongside this offer, it is considered there is scope to introduce some grant aid-funding which would help overcome certain barriers that new or existing businesses face.
- 3.3 Whilst there is a current grant scheme delivered by the Stoke and Staffordshire Growth Hub, this provides capital grants from £1,500 to £10,000 to businesses undertaking business to business activity and trading for a minimum of 12 months. However this does not serve to meet businesses who have been trading for less than 12 months, undertaking business to consumer activity and in need of a smaller grant. With minimal support on offer locally in the form of a small grant for new and young businesses and a lot of businesses being ineligible for current schemes their needs aren't able to be met.
- 3.4 Research on and engagement with national and regional bodies who previously or currently run small grant schemes has provided evidence to support the proposed scheme and shape the criteria set out. Local evidence to support such a scheme has also been identified via responses from local business to consultations and direct contact with the Council's economic development service.

3.5 It is being recommended that a small business grant scheme shall award up to 50% grant funding ranging from £500 to £1,500 per business/start up towards capital equipment, training or marketing activities for qualifying businesses.

To be eligible, applicants must:

- Where a business is not already established, want to become self-employed and set up a business in Lichfield District, or
- Be a small business (up to 10 employees) in Lichfield District who have been trading for no more than three years.

The proposed scheme shall run on an initial three year programme with £20,000 being allocated per annum and with annual reviews built in. The grant is designed to support individuals looking to start up a business or young businesses looking to grow by overcoming financial barriers, assisting their growth and development. Businesses who are seeking to access this funding must first receive support from the free Enterprise for Success programme. The programme encourages new business start-ups and helps young businesses grow and thrive by offering a range of business workshops with individual business support sessions. The support provides valuable information for applicants to strengthen their business model and strategy, and develop a strong business plan, which is a supporting document in the application process, to positively influence the company's long term survival.

Appendix 1 provides further detailed information on the suggested grant and the procedure for making an application.

3.6 The implementation of a small business grant scheme by Lichfield District Council for local individuals and businesses to access would align with the delivery of priorities within the Council's Economic Development Strategy:

Business engagement

The grant scheme would provide a platform to enhance contact with an increased number of businesses who refer to the Council for business advice and guidance for their growth plans.

Local programme delivery

The grant scheme would complement what is currently on offer from the two local Growth Hubs and other strategic partners for local businesses at the early stage of their business life. Applicants must receive support from the Enterprise for Success programme before receiving the grant, providing valuable support for the strategic development of their business.

Sector specific support

Although not sector specific support, the grant would support the growth of different business sectors within Lichfield District which previously may have been ineligible for business support.

Creating an entrepreneurial culture

The delivery of a small business grant scheme would strengthen the development of new entrepreneurial business opportunities by supporting individuals faced with early 'financial barriers'.

3.7 As stated above in recommending the introduction of a small business grant scheme, evidence to support a scheme has been identified including locally:

Tamworth and Lichfield Business Survey 2015/16

As part of the Tamworth and Lichfield Business Survey 2015/16 local businesses were asked what kind of support they would benefit from and where there was gaps in existing business support offers.

Within the survey, when anticipating seeking future advice for support, the top three categories businesses identified were:

- 1) Availability of financial grants (30%)

2) Sales and Marketing (26%)

3) Apprenticeships (24%)

The top three investment areas businesses identified to support business growth plans were:

1) Sales and marketing (70%)

2) Recruiting new staff (50%)

3) Capital equipment (44%)

With new businesses operating for up to three years least likely to use their existing cash flows/profits to finance their investment plans.

A small proportion of businesses (20%) who have been trading for up to three years expect securing investment to be easy compared with businesses trading for over four years (35-40%). When discussing the topic of customer types, micro businesses are most likely to trade solely with business to consumer customers, with 34% of Lichfield businesses trading solely with business to consumer customers.

The survey results have been used to inform the eligible criteria of the proposed small grant scheme by the grant funding going towards capital equipment, training or marketing activities and available to businesses trading with business to consumer customers.

To complement the local evidence, officers have researched other schemes from across the country to see how these operate and importantly identify what results they bring:

Examples of small business grant schemes across the country

Within the research undertaken, local authorities established and implemented a grant scheme for the following reasons:

- A funding gap being in place for the business demographic of pre start or young businesses
- Being ineligible for other funding sources
- To support individuals overcoming the financial barrier of starting a business

The financial assistance provided by funding schemes of this nature are seen to accelerate proposed growth plans for businesses and individuals who are 'starting up' their business. Examples of previous and current small business grant schemes are provided in **Appendix 2**.

3.8 In terms of the outputs and outcomes these can be described as follows: Discussions have been undertaken with other local authorities who manage these previous or currently active small business grant schemes. The overall outcomes highlighted within examples analysed are as follows:

Job creation

The investment into the business from the schemes being in place has allowed local businesses who have identified a future ambition to expand their team to grow earlier than their businesses natural growth.

Private sector match

The majority of 'match' funding from applicants on other small business grant schemes is received from their own company reserves or cash flow, with businesses able to develop confidence to commit their own investment into a project, boosting the local economy and supporting the growth of local businesses.

Local business community knowledge and engagement

The operation of a grant scheme by a local authority has developed an opportunity to increase engagement, connections and knowledge on the local business community.

Supporting diverse local businesses to grow

A diverse range of businesses have been successful in receiving grant scheme support, encouraging them to grow quicker and more effectively than they would have otherwise done.

Supporting local businesses with long term growth and survival

Businesses who receive support and advice believe it's a valuable learning experience when considering the growth potential of their business with staff considering and refining their business model.

- 3.9 Based on the information provided above members are asked to consider the merits of introducing a small business grant scheme to support new and existing businesses in the district. If a positive recommendation is made to the Cabinet and the Cabinet duly support this, reports on progress of the scheme would be brought to this Committee for members to assess and evaluate.

Alternative Options	<ol style="list-style-type: none"> 1. The Committee recommends amendments to the proposed small business grant scheme outline and criteria. 2. If the proposal is not approved there shall be no small business grant scheme option delivered for new and young businesses within Lichfield District with individuals having to see if they are eligible for other funding sources.
Consultation	<ol style="list-style-type: none"> 1. Evidence for the need of a financial resource is provided by enquiries received from businesses searching for funding sources and, the Lichfield and Tamworth Business Survey 2015/16, with information provided supporting the shape and guide the criteria for the scheme. 2. Consultations have taken place with other local authorities who have previously or currently implement a small business grant scheme has been with best practice shared. 3. A briefing note has been provided to Leadership Team with comments received.
Financial Implications	<ol style="list-style-type: none"> 1. The allocation of £20,000 per annum for an initial three year programme, totalling to an overall amount of £60,000 being allocated to the grant scheme, being met within existing budgets. The proposed scheme shall have reviews built in annually. 2. Officer time will be required with regards to: <ul style="list-style-type: none"> - Answering enquiries and administration of the scheme - Processing applications - Marketing and promotion
Contribution to the Delivery of the Strategic Plan	<ol style="list-style-type: none"> 1. The small business grant scheme shall contribute to the priority of a vibrant & prosperous economy as it supports opportunities for local business growth, self-employment and job creation. 2. The priority of healthy and safe communities is supported through local resident's economic wellbeing being improved by the financial resource strengthening local employment, less unemployed residents and business growth creating less financial concern for local residents involved within the businesses.
Equality, Diversity and Human Rights Implications	<ol style="list-style-type: none"> 1. The implementation of a small business grant scheme by Lichfield District Council provides the opportunity for job creation to be undertaken by businesses looking to expand who have received support by the scheme. The initial process for the scheme of receiving strategic business support, pre or post start, from the Enterprise for Success programme assists the long term growth and survival of local businesses.

Crime & Safety Issues	1. None.
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	Risk Description	How We Manage It	Severity of Risk (RYG)
A	Lack of uptake within the grant scheme by local businesses.	By promoting the scheme on all communication platforms, to local business groups and strategic partners to establish wide publicity, and making sure it's a simple process for businesses looking for support.	Yellow
B	Popularity of the scheme and grants requested overall being greater than the allocated amount per annum.	Grant allocation shall be established with the proposals which provide the most realistic positive impact on the local economy being recommended and granted, in line with the allocated amount per annum.	Yellow
C	No impact on business start-up and survival	To review the scheme making sure that amendments made from the initial scheme create a positive impact/outcome on business start-up and survival rates.	Yellow
D	Cost of administering and delivering scheme outweighs the benefits accrued to the economy.	By simplifying the administering of applications and undertake measures which will support the increase in popularity of the scheme to benefit the economy.	Yellow

Background documents
Lichfield and Tamworth Business Survey 2015/16

Relevant web links

Enterprise for Success programme - www.enterpriseforsuccess.co.uk/

East Staffordshire Borough Council 'Business Development Fund' - www.eaststaffsbc.gov.uk/business-and-investment/business-development-fund

Cannock Chase District Council 'Let's Grow Programme' - www.cannockchasedc.gov.uk/business/economic-development/open-business/sources-finance

Richmondshire District Council 'Small Business Grant Scheme' - www.richmondshire.gov.uk/news/latest-news/small-business-grant-scheme/

Worcester City Council 'Business Start-up Scheme' - www.worcester.gov.uk/business-start-up-support

Worcester City Council 'Business Growth Grant Scheme' - www.worcester.gov.uk/business-growth-grant

Orkney Islands Council 'New Business Start-Up Grant' –

www.bgateway.com/images/uploads/general/LOW_RES_3539_OIC_New_Business_Grant.pdf

West Sussex 'Small Business Grant Scheme'

Arun District Council - www.arun.gov.uk/leap

Crawley Borough Council -

www.crawley.gov.uk/pw/Business/Business_Resources_and_Support/Business_Funding_and_Grants/index.htm

Appendix 1: Proposed grant scheme process

Applicants must first receive 'pre-start' or 'post start' support offered by the free Enterprise for Success programme, which Lichfield District Council is a delivery partner in, before being eligible to receive the grant assistance. The assigned business advisor within the programme shall sign a business's application form confirming they have received support.

The programme offers a combination of business advice and courses:

- Pre-start support: 2 day business start-up course (covering aspects such as financial control techniques, market research and writing a business plan) and one-to-one business advice.
- Post start support: Business development workshops (marketing, social media, access to finance, bookkeeping and accounts) and one-to-one business advice.

Following on from receiving support from the Enterprise for Success programme:

- An applicant's application form with supporting documents (business plan and financial projection for the next 2 years) shall be processed by the Economic Development service and recommendations made for Cabinet approval.
- Successful applicants will need to claim all items outlined in their application on one claim payment form, providing proof of expenditure in the form of invoices or receipts within 3 months of the project start date stated on their confirmation letter, which is received when their application is successful for grant funding.
- A 6 month progress report will need to be completed after the project start date set out on their confirmation letter.

Appendix 2: Evidence of previous or current small business grant schemes run by local authorities

East Staffordshire Borough Council Business Development Fund

East Staffordshire Borough Council previously ran 2 rounds of the Business Development Fund which was aimed at East Staffordshire SMEs looking to grow and expand their business or local entrepreneurs seeking financial assistance with a condition being that the project must create jobs.

The programmes offer was:

- Up to 50% grant funding was offered towards eligible project costs
- With new SMEs able to access funding ranging from £500 to £5,000
- With existing SMEs able to access funding ranging from £500 to £10,000.

The target objectives outlined in the initial documentation for this programme was to:

- Support East Staffordshire to achieve sustainable economic growth.
- Strengthen the enterprise culture in East Staffordshire.
- Assist local businesses to grow by offering high quality business advice tailored to their business needs.
- Support local SME's to realise ambitious growth, investment plans and create new employment opportunities for local people.
- Provide 'seedcorn' grant funding to new start-up companies with a viable and ambitious business proposition.
- Create up to 40 new jobs; a significant proportion should be filled by local residents.
- Lever approximately £200,000 of private sector investment to boost the local economy.

The achieved output from round 2 of the programme compared to the target quantitative objectives has exceeded expectations by 90 jobs being created or safeguarded, with the target being 40 new jobs. The private sector money levered to support applications was £254,287, greater than the £200,000 target.

The funding has been seen to encourage business owners to reflect on their business:

- Gain a more thorough understanding of their growth plans via their business plan.
- Encourage them to commit to creating jobs.

With regards to local business engagement and knowledge, the grant scheme has created:

- A growing database of business contacts for the council and increased referrals.
- Established easier communication leads for future interaction with regards to further business support programmes.

	<u>Round 1 (2013/14)</u>	<u>Round 2 (2014/15)</u>
Number of businesses received funding	21	29
Jobs to be created	66	77
Jobs to be safeguarded	6	13
Private sector money levered	£255,564	£254,287
East Staffordshire BC Grant Committed	£150,000	£200,000

Cannock Chase District Council Let's Grow Programme

Cannock Chase District Council currently run the Let's Grow Programme aiming to:

- Provide financial assistance to help SMEs expand and grow with businesses who access the funding able to undertake projects to safeguard existing employment and as a condition create at least one full time job.

The programme offers:

- Up to 50% grant funding towards eligible project costs with a maximum grant of £5,000 to an SME who has been trading for more than 6 months.

So far, as shown in the table below, 22 businesses have successfully received funding from the programme, creating 42.5 jobs and safeguarding 2 jobs. The private sector money levered to support applications makes up 61.9% of the overall money invested into the programme, with 38.1% being committed by the local authority.

	<u>Output so far</u>
Number of businesses received funding	22
Jobs to be created	42.5
Jobs to be safeguarded	2
Private sector money levered	Roughly £142,000
Cannock Chase DC Grant Committed	Roughly £88,000

Richmondshire District Council Small Business Grant Scheme

Richmondshire District Council currently run a small business grant scheme aimed at:

- Supporting small businesses by encouraging them to invest in improvements, aiming to generate an increase in business turnover or job creation within the district.

The scheme offers:

- Maximum support of £1,000, covering up to 75% of total project costs.

To be eligible, businesses have to be established with a base in the district and operate with four or less employees.

No quantitative output targets, such as job creation or private sector money leverage, were set when the current Business Grant Scheme began. In 2013, a local Business Forum consultation concluded with businesses stating that a small grants scheme which is easy to access is needed, with further support for a scheme being from enquiries received.

The Small Business Grant Scheme has been popular since starting in October 2013 with 182 applications being received, and 142 businesses being approved. Businesses are able to provide funding to support the Council's monetary commitment to their application through company reserves, loans etc. with 52% of total project costs coming from private sector money leverage. Since the scheme began, the only changes made during the scheme's active timeline are eligibility criteria and the amount of funding available.

	<u>Output so far</u>
Number of applications received	182
Number of business received funding	142
Private sector money levered	£130,962
Richmondshire DC Grant Committed	£120,628

Worcester City Council Business Start-up and Growth Grant Schemes

Worcester City Council currently run two grant programmes:

- The Business Start-up grant programme
- The Business Growth grant programme

The programmes were set up to offer grants to businesses who were non-eligible for the Enterprising in Worcestershire programme, mainly business to consumer trading businesses.

The aim of the grant schemes are:

- To encourage the occupation of vacant commercial premises
- Help regenerate neighbourhoods
- Stimulate entrepreneurship
- Create new jobs
- Enhance the sustainability of new businesses

The schemes offer:

- Up to £1,000 for business start-ups (within their first year of trading).
- £1,000 to £3,000 for business growth (Been trading for more than one year).

With businesses required to provide at least 50% of the grant for both programmes.

The amount of funding which was allocated within both programmes overall for years 2016-17, 2017-18 and 2018-19 was £60,000. The target set for each year in terms of businesses who've received grant funding is seen in the below table with the current output performance set with the below figures. With regards to the outputs, the total amount of businesses who received funding in 2016/17, 17 businesses, exceeded the target, 14 businesses. For 2017/18, the output fell short, 10 businesses, from the target set of 14 businesses.

From the 16 businesses who have so far received funding from the Business Start-up grant, 31 jobs were created or safeguarded. Within the 11 businesses who have so far received support from the Business Growth grant, 51 jobs have been created/safeguarded. As within other small business grant scheme examples, the amount of private sector money levered is dominant with so far, 62.7% of money within the scheme being from the private sector.

	<u>Output so far (Target)</u>
Number of businesses received funding (2016/17)	Start up – 13, Growth Grants – 4, Total - 17 (14)
Number of businesses received funding (2017/18)	Start up – 3, Growth Grants – 7, Total - 10 (14)
Number of businesses received funding (2018/19)	(12)
Business Start-up, number of jobs created/safeguarded	31
Growth Grants, number of jobs created/safeguarded	51
Private sector money levered	£61,685
Worcester CC Grant Committed	£36,731

Orkney Islands Council New Business Start Up Grant Scheme

In April 2011, a 2 year New Business Start-up Grant pilot programme took place within the Orkney Islands to:

- Provide grant assistance of up to a maximum of £1,500 per applicant towards start-up businesses.

A budget allocation of £40,000 per annum towards a total project cost of £80,000. The grant scheme was created as a funding gap had been identified.

The main aims of the project were focussed on driving up the competitiveness, growth and survival of new businesses in Orkney by:

- Creating employment opportunities
- Support communities in fragile areas
- Encouraging economic diversification
- Encouraging inward investment across the islands
- To help grow the economy

An original target was set for the number of applicants to be 50 applicants, which has been calculated by the overall allocated funding available and maximum amount.

The output of the grant shows that:

- There were 34 successful applicants.
- 42 full time equivalent jobs were created.

Businesses who were looking to access the grant had to provide supportive evidence in the form of a business plan and engagement with the Business Gateway (national business support service in Scotland but delivered by each authority). With the grant scheme in place, between 2011-2013, new business engagement with the Business Gateway grew, as shown in the below table.

Year	Number of new businesses engaging with Business Gateway
2009/10	18
2010/11	32
2011/12	43
2012 to date (Apr-Dec)	40 (9 month period)

West Sussex Small Business Grant Scheme

All West Sussex Councils run a small business grant scheme for:

- Business start-ups to help cover initial costs.
- For small businesses who are looking to grow with the leading delivery partner being West Sussex County Council.

The purpose of the funding is:

- To provide local new businesses a cash injection for either capital or revenue investment in their projects that will lead to employment or business growth outcomes.

The criteria for the scheme is that small businesses with less than 50 employees who operate within the West Sussex area will be able to apply for business support grants of up to £2,000, with at least 50% of the total project costs being provided by the small business.

When the scheme began, managed by Arun District Council with the support from West Sussex County Council, the outcomes from a business grant being in place is shown below with no quantitative output targets in place as they were naturally set by the amount of funding available.

The original cabinet report for the proposed grant scheme outlined:

- How the grants will fill a gap in the current business grant offer.
- Provide a cash injection for either capital or revenue investment in projects that will lead to employment or business growth outcomes.

The job creation referred to in the below outcomes is referencing apprenticeships created with the platform which the grant scheme is run from involving creating apprenticeships within local businesses.

Outcomes:

- Number of businesses applying for the grant.
- Number of businesses being awarded the grant.
- Number of new jobs created (apprenticeships created).

The two examples below from West Sussex local authorities on the latest round of funding shows the importance of private sector leverage, with 64.2% of money committed within the programme being from company funds, loans etc., which local businesses have committed towards their development and growth, having an overall positive impact on the local economy. The local authority only needing to commit 35.8% towards local businesses.

Arun District Council

	<u>Outputs so far</u>
Number of grant applications	53
Number of business received funding	48
Number of new jobs created (apprenticeships created)	8
Private sector money levered	£139,956
Arun DC Grant Committed	£71,428

Although the table below has a lower percentage as Arun District Council of private sector investment, 60.1%, compared with the local authorities funding committed. It does show the commitment local businesses have towards their growth which is provided a 'boost' by a small grant scheme being in place.

Crawley Borough Council

	<u>Outputs so far</u>
Number of grant applications	41
Number of business received funding	28
Number of new jobs created (apprenticeships created)	0
Private sector money levered	£62,025
Crawley BC Grant Committed	£41,175

Local Plan and related spatial policy matters update

Report of the Cabinet Member for Economic Growth, Environment & Development Services:
Councillor I. Pritchard



Date: 19th September 2018
 Contact Officer: Craig Jordan/ Ashley Baldwin
 Tel Number: 01543 308202/ 308147
 Email: craig.jordan@lichfielddc.gov.uk/
 ashley.baldwin@lichfielddc.gov.uk
 Key Decision? YES
 Local Ward Members ALL

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

1. Executive Summary

- 1.1 The Local Plan Allocations document has now been examined by the Planning Inspectorate. The Council now await the Inspectors Report.
- 1.2 Consultation on the Local Plan Review Scope, Issues and Options concluded on 11 June 2018. In total 1,637 responses were received from 260 individual consultees. The report identifies the key issues arising from the consultation and the next steps in developing the Review.
- 1.3 There is a need to review the draft Statement of Community Involvement before it is submitted to Cabinet for the purposes of public consultation.
- 1.4 In respect of Neighbourhood Plan progress this is positive with three referendums having taken place on the 5th September.

2. Recommendations

- 2.1 That the Committee notes the progress associated with the Local Plan Allocations and Local Plan Review.
- 2.2 That the Committee note the summary of representations received to the Local Plan Review Issues and Options consultation and the officer responses.
- 2.3 That the Committee note the need to review the content of the Statement of Community Involvement in more detail and subsequently present this to Cabinet to request permission consult on the proposed changes.
- 2.4 The Committee notes the recent progress in relation to neighbourhood plans within Lichfield District.

3. Background

Local Plan Allocations

- 3.1 In preparing the Local Plan Allocations document, Members will recall that the Council has undertaken a considerable amount of consultation and stakeholder engagement as part of the plan making process which has helped shape the final version of the document. Table 1 sets out the stages of public engagement on the Plan.

Table 1: Local Plan Allocations public engagement

Date	Consultation Stage
August – October 2016	Open Consultation (Regulation 18) on the scope and nature of the Plan.
March – May 2017	Consultation on the publication version of the Plan (Regulation 19).
January – February 2018	Additional ‘Focused Changes’ consultation on the publication version of the Plan (Regulation 19). This was a modified version of the plan that had been consulted upon in 2017.
September 2018	2 week examination on the Local Plan Allocations.

- 3.2 The Council consulted on the proposed scope and nature of the Local Plan Allocations document between August and October 2016. In total 98 representations were received and those responses alongside the evidence base were used to inform the preparation and site selection for the publication version of the Local Plan Allocations document. The Council undertook consultation on this document between March and May 2017 and in total approximately 5,000 responses (including generic responses and petitions) were received. Officers assessed each of the representations received and reviewed the housing land supply position. As part of this review officers took account of several appeal decisions from the Secretary of State which had a bearing on the land supply position. This analysis identified that from an overall housing land supply perspective there is enough capacity within the District to deliver the 10,030 dwelling requirement in the adopted Local Plan Strategy without releasing sites from the Green Belt as part of the Local Plan Allocations. This resulted in a further consultation on a revised publication document entitled ‘Focused Changes’ between January and February 2018.
- 3.3 The Local Plan Allocations document has now been examined by the Planning Inspectorate. The Council now await the Inspectors findings. The Inspector can either find the plan sound, sound subject to modifications (this may require further consultation) or unsound.
- 3.4 The examination focused on specific matters raised by the Inspector (**APPENDIX A**). In total officers prepared 12 matter statement responses dealing with each of the matters raised by the Inspector. In addition officers worked with other parties to agree Statements of Common Ground to assist with the Examination proceedings.
- 3.5 In respect of third party submissions, 26 parties submitted matters statements to the Planning Inspector for his consideration. In addition to those who submitted matter statements a number of parties requested to attend hearing sessions. **APPENDIX B** provides a full breakdown of those who submitted matters statements and those who requested to attend against each matter. Officers will provide a verbal update to the Overview and Scrutiny Committee regarding the Examination process and any issues that arose. Matter statements can be viewed on the [Programme Officers website](#)¹.
- 3.6 In addition to those appearing at the sessions Walsall Metropolitan Borough Council (WMBC) submitted a statement to the Inspector. At the time of submission WMBC determined it not necessary to appear. Given the nature of the submission, the issues raised and the fact that WMBC were not appearing a response for Lichfield District Council was submitted to the Inspector. A copy of the Walsall’s submission and Lichfield District Council response is attached to this report (**APPENDIX C**)

3.7 The consultation on the first stage of the Local Plan Review generated significant interest. In total 1,637 responses were received from 260 individual consultees. This was despite the fact the Council was criticised for the quality of publicity for the consultation exercise. This feedback has been shared with the Council’s communications team and will inform future community engagement on such matters – see below. Table 2 identifies the marketing and consultation undertaken.

Table 2 – Local Plan Review consultation information

What was done	Marketing or consultation
Emails to Parish Council clerks ahead of the consultation period offering a presentation	Marketing
Emails to District Councillors ahead of consultation period	Marketing
Press Releases	Marketing
Facebook updates	Marketing
Twitter updates	Marketing
Letters/ emails to all those on the Local Plan consultation database	Marketing
Presentations (with Q&A session) to Parish Councils	Consultation
Meetings with resident groups, stakeholders and private sector organisations	Consultation
Drop in events at Lichfield District Council and Burntwood library	Consultation
Executive summary produced	Consultation
Duty officer available during office hours	Consultation
Documents on deposit at Council offices, Lichfield library and Burntwood library	Consultation

3.8 It is not uncommon to receive negative feedback during planning policy related consultations. However it is necessary to consider whether there are any lessons to be learnt and whether improvements can be made in the future. The primary suggestion put forward at events was for a letter drop across the District. This would certainly raise awareness of any consultation, however the cost is significant. The cost would certainly be in excess of the current allocated budget.

3.9 The next round of consultation is due in January 2019. Ahead of the consultation officers will analyse the primary objective of the consultation to identify potential methods of marketing and consultation delivery. This process will be undertaken with the support of the Council’s communications team.

3.10 In terms of the consultation responses these are summarised together with officer comments at **Appendix D**. A summary of the key themes arising from the consultation are set out in the table below.

Table 3: Local Plan Review – key themes arising from consultation

Summary of response	Summary of analysis
The review should provide explicit consideration to 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,

Summary of response	Summary of analysis
There needs to be greater emphasis on economic growth and the needs associated with employment.	objectives and strategic priorities. 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.
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 will need to be addressed as the Council move through the site selection process.
The existing urban areas are at capacity which triggers the needs to focus growth in other areas of the District.	This will need to be addressed as the Council move through the site selection process.
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 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/ Stonall and Little Aston made a significant amount of generic objections opposing growth in this area. This is comparatively higher than other areas across the District.	From a planning policy perspective the number of respondents should not be a reason to halt progress with considering site allocations in the area. Growth in this area will need to be tested in line with the other options.

3.11 The next step for officers is to commence work on providing the extensive evidence base required to inform the Review. This evidence base will consider the findings of the Local Plan Review consultation and also importantly the new National Planning Policy Framework (NPPF) (2018). The NPPF (2018) is a major milestone for the Plan Review. It provides the Authority with a revised approach to Plan making and it is essential that the Review addresses its contents.

3.12 It is disappointing that the release of the NPPF (2018) was not accompanied by a full suite of supporting guidance. This is important because the guidance will provide the Authority with the

direction for ensuring evidence is completed appropriately. This delay will undoubtedly impact the next round of consultation on the Local Plan Review. In developing the next stage of the Review officers will need to consider how long evidence will take to prepare as well as analysing the findings of evidence.

- 3.13 However, the Authority has made a commitment to progressing with the Review and it is important that the Authority continue to make good progress on the Plan Review in line with this commitment.

Statement of Community Involvement

- 3.14 Members will recall from a previous report that an update to the Council's Statement of Community Involvement (SCI) is required. A Statement of Community Involvement (SCI) is a statutory requirement and sets out how the Local Planning Authority will consult when undertaking its statutory planning functions such as the preparation of a Local Plan and determination of planning applications.

- 3.15 Our current SCI was adopted in 2016. Since this time there have been a number of legislative changes which need to be considered and reflected in an amended SCI to keep it up to date and easy to use. Officers are currently reviewing the existing SCI and this work will need to take account of any future guidance to be released by Government.

- 3.16 The following considerations will need to apply to any review as well as specific changes required to comply with legislation, regulations and guidance:

- Development Plan Documents;
 - How we prepare the Local Development Scheme;
 - How we publish evidence and supporting documents;
- Neighbourhood Planning;
 - Removing the need to publicise applications for the designation of a neighbourhood area, and aligned to this there is no requirement to seek public comment on potential designations;
 - Introduce flexibility for modifying neighbourhood plans that are in force to keep them up to date;
 - Facilitate the modification of a neighbourhood area and provide for what will happen to a made Neighbourhood Plan that is already in force in that area.
- Development Management
 - Adding neighbourhood planning qualifying bodies to those that are identified within the SCI and being notified of planning applications;
 - Noting that planning consultation timescales should include extra days where bank holidays occur;
 - Note that in relation to Permission in Principle, consultation will be undertaken in accordance with the Regulations.

- 3.17 The SCI update is on-going with officers drafting the relevant changes. A report requesting consultation on the SCI will in due course be presented to Cabinet. This will be followed by analysis of responses, and subject to the necessary changes a final draft will be developed which will be reported to this Committee prior to presentation to Cabinet for formal approval.

Neighbourhood Plans

3.18 There has been further progress on a number of Neighbourhood Plans which can be summarised as follows:

- Alrewas, Armitage with Handsacre and Longdon Neighbourhood Plans – have successfully passed through examination to referendum. The referendums for all three plans took place on Wednesday 5 September 2018. Local residents voted in favour of all three neighbourhood plans.
- Elford Neighbourhood Plan – Elford Parish Council recently submitted their neighbourhood plan for examination. At the time of writing the examiner’s final report has not been published. A verbal update will be provided as to the progress of the examination.
- Fradley Neighbourhood Plan – Fradley Parish Council recently submitted their neighbourhood plan for examination. The examination is scheduled to take place this month.
- Fazeley Neighbourhood Plan – Fazeley Town Council have recently had their parish area designated as a neighbourhood area as the first stage in the preparation of a neighbourhood plan. The District Council will provide advice and guidance to the community as they progress their plan.

3.19 The District Council will continue to work with communities providing advice and guidance throughout the Neighbourhood Plan process. This includes providing detailed comments and representations on drafts of the Neighbourhood Plans when requested by the Parish Councils.

Alternative Options	<ol style="list-style-type: none"> 1. That in respect of the Local Plan Review the Committee suggest alternative responses to those proposed by officers. 2. That the Committee do not support the proposed updates to the SCI.
Consultation	<ol style="list-style-type: none"> 1. Consultation may be required should the Local Plan Allocations Inspector propose any modifications 2. Consultation will be required on the next stages of Local Plan Review. 3. Consultation will be required on the proposed revised SCI.
Financial Implications	<ol style="list-style-type: none"> 1. Officer time will be needed to undertake future the consultation on the Local Plan Review. 2. The costs of consultation will be met within approved budgets. 3. There will be a need to commission evidence associated with the Local Plan Review. 4. Officer time will be needed to run the consultation on the revised SCI.
Contribution to the Delivery of the Strategic Plan	<ol style="list-style-type: none"> 1. Supports the priority of a vibrant and prosperous economy as it assists in the delivery of the planning function of the Council. 2. Supports the priority of Healthy and Safe communities by ensuring the provision of housing. 3. Supports the priority of clean, green and welcoming places to live by assisting in allocating land for affordable housing, as well as supporting the delivery of residential and commercial developments.
Equality, Diversity and Human Rights Implications	<ol style="list-style-type: none"> 1. An Equality Impact Assessment accompanies the Local Plan Allocations. 2. An Equality Impact Assessment accompanies the Local Plan Review 3. An Equality Impact Assessment will accompany the SCI
Crime & Safety Issues	<ol style="list-style-type: none"> 1. None.

	Risk Description	How We Manage It	Severity of Risk (RYG)
A	Clarity over the GBHMA shortfall is not achieved and the Council are unable to effectively progress with the Local Plan Review.	Officers continue dialogue with neighbouring authorities on this matter.	Yellow
B	Evidence required to support the Local Plan Review has a detrimental impact on the proposed timescales and allocated budget.	Consideration of evidence base requirements is an iterative process. Officers will continue engagement with stakeholders involved in shaping evidence base requirements to ensure the initial scope is clear. Project management practices are followed in the preparation and delivery of evidence base. New requirements arising from external factors such as future consultations will be considered by officers.	Yellow
C	Modification requirements are proposed by the Local Plan Allocations Inspector which detrimentally impacts the timetable for adoption.	Officers will consider Inspector findings and if modifications are required an updated timetable will be presented to Members.	Yellow

Background documents:

Local Plan Allocations Inspectors Matters Issues and Questions

Local Plan Allocations – matter statements

Local Plan Strategy 2015

Local Plan Allocations Regulation 19 (Focused Changes)

Local Plan Review April – June 2018 consultation document

Statement of Community Involvement

Local Development Scheme

Relevant web links:

[Local Plan Allocations Inspectors Matters Issues and Questions](#)

[Local Plan Allocations – full set of Lichfield District Council matter statements and third party matter statements](#)

[Local Plan Strategy 2015](#)

[Local Plan Allocations Regulation 19 \(Focused Changes\)](#)

[Local Plan review April – June 2018 consultation document](#)

[Statement of Community Involvement](#)

[Local Development Scheme](#)

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Draft Lichfield Local Plan Allocations Document – Part 2 Examination

Inspector's Matters, Issues and Questions Discussion Note

Introduction

This note provides a summary of the matters and issues identified by the Inspector in the form of questions, and they will form the basis of the Examination Hearings which commence on Tuesday 4 September 2018 at the Council Offices, Frog Lane, Lichfield, Staffordshire, WS13 6YZ 1BP. This note may be refined in the light of the Inspector's consideration of the Hearing Statements received prior to the Examination Hearings.

Please note that the word limit for further statements is 3,000 words per matter (excluding supporting information, such as Appendices). Some flexibility, however, will be given to the Council, who will be expected to respond to all statements submitted by other parties.

Matter 1 - Legal Requirements, Scope of the Local Plan and Duty to Co-operate

1.1 Legal Requirements:

Does the Local Plan meet all its legal requirements (e.g. in relation to the Local Development Scheme; Statement of Community Involvement; and Local Development Regulations 2012)? Are there any other legal compliance issues?

1.2 Scope of this part of the Local Plan

- (i) Is the scope of the Plan in line with its intended role, for example as set out in Section 1 and in particular in paragraphs 1.3, and 1.4 of the submitted Plan, in which clear reference is made to Lichfield's adopted Spatial Strategy which provides for the delivery of 10,030 homes from 2008 to 2029?*
- (ii) Does the scope of the Plan accord with the recent Court of Appeal (COA) Judgment of Oxted Residential Ltd v Tandridge District Council (EWCA Civ 414; 29 April 2016)? This COA Judgment is in the Examination Library, and the paragraphs that I would particularly like to draw attention to are: 28, 31, 32 and 38. The third sentence of paragraph 38 states: **An Inspector conducting an examination must establish the true scope of the development plan document he is dealing with, and what it***

is setting out to do. Only then will he be able to properly judge "whether or not, within the scope and within what it has set out to do", it is "sound" (Section 20(5)(b) [of the 2004 Act]).

- (iii) *Are there any valid Part 2 issues which the Plan has failed to address?*

1.3 Duty to Cooperate (DTC):

- (i) *Is the DTC, which covers strategic matters, applicable to the Plan, and if so, has the Council adequately discharged the DTC in preparing the Plan?*
- (ii) *In particular, does the Plan satisfy the DTC in relation to planning for the longer term growth of neighbouring areas?*

Matter 2 - Sustainability Appraisal (SA) and Habitats Regulation Assessment (HRA)

- 2.1 *Is the Plan supported by the SA and HRA?*
- 2.2 *What evidence is there that the SA has influenced the Plan and/or undertaken a full assessment of realistic alternatives?*
- 2.3 *Do any adverse effects identified in the SA require significant mitigation, and how does the Plan address these issues? Has appropriate account been taken of the recent Sweetman 2 Judgment in the ECJ?*

Matter 3 – Does the Plan deliver the strategic housing provision to meet the needs of the Plan area over the plan period?

3.1 New Homes Quantum:

- (i) *Does the quantum of new homes provided for in the Plan over the plan period (as set out in Table 4.1) accord with the growth requirements as set out in Core Policy 1 in the Local Plan Strategy (2015)?*
- (ii) *Is the proposed 'buffer' of around 15% sufficient to enable the Plan to ensure there is sufficient flexibility of housing land over the plan period?*

3.2 Proposed Distribution of new homes:

- (i) Does the proposed distribution of new homes (also set out in table 4.1) accord with the principles of sustainable development, particularly as set out in the Local Plan Strategy (LPS) (2015), including taking account of considerations such as: the proportion of new housing planned for urban areas/most sustainable settlements; proximity to employment, sustainable transport and community facilities; and adverse impact on areas/zones of environmental importance?*
- (ii) What is the justification for increasing allocations in rural areas from 5% in Allocations Plan to 12.5% of overall housing figure in Focused Changes Document whilst correspondingly reducing the proportions in what are commonly regarded as the two most sustainable settlements of Lichfield and Burntwood? In particular, where are the housing needs for local people in Lichfield and Burntwood likely to be met?*

3.3 Housing Delivery over the Plan Period:

- (i) Does the Plan provide sufficient evidence to demonstrate that the proposed new homes total can be implemented over the plan period?*
- (ii) Are the implementation rates of large sites, such as Arkall Farm (1,000 dwellings), the former Rugeley Power Station (800 dwellings) and land at Watery Lane (750 dwellings), realistic?*

3.4 Five Year Housing Land Supply:

Would the Plan at adoption be able to demonstrate that it has a five year supply of specific, viable and deliverable sites to achieve the Plan's requirements?

3.5 Qualitative aspects of housing supply:

Is there a need for any qualitative parameters for housing provision in the Plan, such as provision for affordable housing, self-build, older persons' accommodation, care homes, accessible housing, student housing, and accommodation for gypsies and travellers (G&T)? Should policy GT1 meet identified G&T need?

3.6 Other Housing Issues:

Are there any other housing issues which go to the soundness of the Plan?

Matter 4 - Can the Plan deliver its quantitative and qualitative housing requirements without the need to remove any Green Belt land?

- 4.1 *Should the Green Belt, as set out in LPS Core Policy 1, remain in force in its entirety throughout the plan period, and continue to be a permanent constraint?*
- 4.2 *Do any circumstances exist to justify the alteration of the Green Belt boundaries in advance of a future review of the LPS, as set out in paragraph 83 of the Framework?*
- 4.3 *Should the Plan provide clearer guidance on Green Belt infill boundaries, as provided for in LPS Core Policy 1?*

Matter 5 - How should the Plan deal with the housing shortfall in neighbouring authorities, such as Birmingham and Tamworth?

- 5.1 *In view of the urgency of making housing provision to meet the needs of Greater Birmingham, what are the arguments for delaying a positive response until the Local Plan Review? Does the GBHMA suggest a timeframe and quantum for contributions from Councils such as Lichfield? Is the estimated date for adopting such a review still December 2020? Should not this Plan be aiming to contribute towards these wider needs before December 2020, a date which may slip? [An MOU or SCG between the GBHMA and/or Birmingham CC and Lichfield DC would be helpful.]*
- 5.2 *Should the Plan deal with Tamworth's housing shortfall during the same review process, or is the need sufficiently urgent for it to be addressed in this Plan? What role would the development at Arkall Farm play in this, and if planning permission is not forthcoming, what should be included in the Plan to address the shortfall? [An MOU or SCG between the Tamworth BC and Lichfield DC would be helpful.]*
- 5.3 *If the review of the Plan is more than an aspiration, should there be a specific policy committing the review process to start by a specific date?*

Matter 6 - Are the Plan's provisions for the protection and enhancement of its environmental, landscape, biodiversity and heritage assets in accordance with national policy?

- 6.1 *Is policy BE2 (Heritage Assets) compliant with NPPF 133 and 134?*
- 6.2 *In the absence of saved policy C9, what is the approach of the Plan towards the protection of Local Green Space?*

Matter 7 - Are the policies to manage and promote the Local Economy and Employment Areas and Allocations sound?

- 7.1 *With reference to policy EMP1, are the expectations in the Plan for employment growth (79.1 ha drawn from the employment portfolio, plus the identification of three sites which are allocated to meet a further requirement of 10 ha), soundly based on a coherent framework?*
- 7.2 *Is the 6.5 ha of employment land allocated to meet the needs of Tamworth justified?*
- 7.3 *Are the specific sites identified in policy EMP1 (sites F2; OR6; and A6) justified and deliverable within the plan period?*
- 7.4 *How effective is the Plan in protecting existing and allocated employment sites from other uses, e.g. housing? Should the Plan set out the parameters of an 'independent assessment' in relation to the attractiveness of the market, and over what period of time?*
- 7.5 *Does the Plan address the need for a housing/employment balance? Is there a balance between housing provision and maintaining an adequate supply of employment land?*
- 7.6 *Is there scope to consider mixed use areas where there is evidence of underuse/closure of industrial/commercial uses?*
- 7.7 *Does policy Lichfield 3 set a sound framework for promoting Lichfield city centre as a retail and commercial centre, and is the proposed primary shopping area extension justified? Should the Plan aim for a town centres first approach for office development?*
- 7.8 *Does policy Burntwood 3 set a sound framework for promoting Burntwood as a retail and commercial centre?*

Matter 8 – Are the Transport, Infrastructure, Implementation and Monitoring provisions of the Plan sound?

- 8.1 *Are there any necessary infrastructure needs that are not addressed in the Plan?*
- 8.2 *Are any of the high impact sewerage constraints classified as 'show stoppers'?*
- 8.3 *In view of Highways England's comments, can the 2017 IDP be relied upon to support specific allocations in the Plan?*
- 8.4 *The Environment Agency expresses concern that it is not immediately apparent that a sequential test has been undertaken by the Council*

regarding flood risk. Has agreement subsequently been reached on the acceptability of sites proposed for the housing and other uses in the Plan?

Matter 9 – Are the Plan’s provisions for Lichfield city centre, including policy Lichfield 3 and Map 8.1 justified and effective?

- 9.1 *Is the Plan sufficiently focused on protecting and enhancing the character and appearance of the city centre?*
- 9.2 *What is the rationale for deleting policies L37 (Lichfield Linear Park) and L49 (Framework Open Space)?*

Matter 10 – Development Management, Uncertainties and Risks

- 10.1 **Development Management:** *Should the Plan provide sufficient guidance to cover aspects of development management which are not explicitly covered in the LPS?*
- 10.2 **Uncertainties and Risks:** *Overall, does the Plan take sufficient account of uncertainties and risks? How flexible is it?*
- 10.3 **Monitoring:** *Are the monitoring arrangements soundly based?*

Matter 11 – Site Allocations in the Plan

- 11.1 *Are the Site Allocations in the Lichfield area (Sites L1-31) acceptable in terms of (a) environmental impact; (b) impact on the living conditions of existing and/or future residents; (c) whether a safe and acceptable vehicular access can be secured; (d) whether there is a willing land owner(s) for all the land concerned; and (e) any other relevant infrastructure, planning or viability constraints in addition to the Key Development Considerations already set out?*
- 11.2 *Are the Site Allocations in the Burntwood area (Sites B1-21) acceptable in terms of (a) environmental impact; (b) impact on the living conditions of existing and/or future residents; (c) whether a safe and acceptable vehicular access can be secured; (d) whether there is a willing land owner(s) for all the land concerned; and (e) any other relevant infrastructure, planning or viability constraints in addition to the Key Development Considerations already set out?*
- 11.3 *Are the Site Allocations in the remainder of the District (Sites NT1-2; R1; F1-2; A1-6; AH1; FZ2-3; GT1; S1; W2-3; H1; and OR1-8)) acceptable in terms of (a) environmental impact; (b) impact on the living conditions of*

existing and/or future residents; (c) whether a safe and acceptable vehicular access can be secured; (d) whether there is a willing land owner(s) for all the land concerned; and (e) any other relevant infrastructure, planning or viability constraints in addition to the Key Development Considerations already set out?

Matter 12 – Are there any other issues of soundness which this Examination should cover?

12.1 *Do any additional soundness issues, relevant to this Plan, arise from the newly published NPPF?*

12.2 *Are there any other soundness issues which this Examination should cover?*

Mike Fox

Planning Inspector

20 July 2018

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Appendix B – Matter Statements and Speakers

Matter subject	Those who submitted matters statements	Those who requested to speak at the sessions
<p>Matter 1: Legal Requirements, Scope of the Plan and Duty to Cooperate</p> <ul style="list-style-type: none"> • Legal Requirements • Scope of the Plan • Duty to Cooperate 	<p>Essington Park Ltd Bloor Homes Richborough Estates Cooper Developments Wilson Bowden Developments Fradley West Consortium Walsall Council (covers additional matters)</p>	<p>Tamworth Borough Council Essington Park Ltd Bloor Homes Richborough Estates Wilson Bowden Developments Davy Developments Fradley West Consortium</p>
<p>Matter 2: Sustainability Appraisal and Habitats Regulation Assessment</p>	<p>Essington Park Ltd Bovis Homes Ltd Metacre Ltd IM Land Fradley West Consortium</p>	<p>Bovis Homes Ltd Essington Park Ltd Metacre Ltd IM Land Fradley West Consortium</p>
<p>Matter 3: Does the Plan deliver the strategic housing provision to meet the needs of the Plan area over the Plan period?</p> <ul style="list-style-type: none"> • New Homes Quantum • Proposed Distribution of New Homes 	<p>Leavesley Group of Companies Redrow Homes Barratt West Midlands CZero Developments Essington Park Bovis Homes Ltd Metacre Ltd Grasscroft Homes & Property Ltd Anwyl Land Ltd Shiple and Baxter Walton Homes Fradley West Consortium IM Land Bloor Homes Richborough Estates Wilson Bowden Developments First City Ltd Lichfield Civic Society Cooper Developments Ltd</p>	<p>Tamworth Borough Council Essington Park Ltd Bovis Homes Ltd Redrow Homes Barratt West Midlands Leavesley Group of Companies CZero Developments Ltd Metacre Ltd Grasscroft Homes & Property Ltd Anwyl Land Ltd Shiple and Baxter Walton Homes IM Land Bloor Homes Richborough Estates Wilson Bowden Developments Davy Developments Fradley West Consortium</p>
<p>Matter 4: Can the Plan deliver its Quantitative and Qualitative Housing Requirements without the need to remove any Green Belt land?</p>	<p>Redrow Homes University Hospitals of Derby & Burton NHS Foundation Trust Barratt West Midlands CZero Developments Essington Park Ltd</p>	<p>South Staffordshire Water, Elford Homes, Mr J Duncan and M P Smith Essington Park Ltd Redrow Homes</p>

Matter subject	Those who submitted matters statements	Those who requested to speak at the sessions
	Metacre Ltd Anwyl Land Ltd Walton Homes Shipley and Baxter IM Land Bloor Homes Richborough Estates Davy Developments Ltd Fradley West Consortium Cooper Developments Ltd First City Ltd	University Hospitals of Derby and Burton NHS Foundation Trust Barratt West Midlands CZero Developments Ltd Metacre Ltd Anwyl Land Ltd Shipley and Baxter Walton Homes IM Land Bloor Homes Richborough Estates Fradley West Consortium
Matter 5: How should the Plan deal with the Housing Shortfall in Neighbouring Authorities, such as Birmingham and Tamworth?	Leavesley Group of Companies Redrow Homes Barratt West Midlands Bovis Homes Ltd Metacre Ltd Gladman Developments Ltd Grasscroft Homes & Property Ltd Shipley and Baxter Walton Homes Bloor Homes Richborough Estates Wilson Bowden Developments Davy Developments Ltd Fradley West Consortium Lichfield Civic Society Cooper Developments Ltd First City Ltd	Tamworth Borough Council Bovis Homes Ltd Redrow Homes Barratt West Midlands Metacre Ltd Gladman Developments Ltd Grasscroft Homes & Property Ltd Shipley and Baxter Walton Homes Bloor Homes Richborough Estates Wilson Bowden Developments Davy Developments Fradley West Consortium
Matter 6: Are the Plan's Provisions for the Protection and Enhancement of its Environmental, Landscape, Biodiversity and Heritage Assets in accordance with National Policy? <ul style="list-style-type: none"> • Policy BE2 Heritage Assets • Local Green Space 	Lichfield Civic Society	Lichfield Civic Society
Matter 7: Are the Policies to Manage and Promote the Local Economy and Employment Areas and Allocations sound? <ul style="list-style-type: none"> • Expectations for Employment Growth 	Greenlight Developments Ltd and the Booth Trustees Davy Developments Ltd FI Real Estate Management Ltd	Tamworth Borough Council Greenlight Developments Ltd and the Booth Trustees Davy Developments FI Real Estate Management Ltd Legal and General

Matter subject	Those who submitted matters statements	Those who requested to speak at the sessions
<ul style="list-style-type: none"> • Employment land to meet Tamworth's needs • Specific sites in policy EM1 • Protecting existing and allocated employment sites from other uses • Housing/employment balance • Scope for mixed use areas • Policy Lichfield 3 • Policy Burntwood 3 		
<p>Matter 8: Are the Transport, Infrastructure, Implementation and Monitoring provisions of the Plan sound?</p> <ul style="list-style-type: none"> • Infrastructure needs not addressed in the Plan • Sewerage constraints • IDP in relation to Highways England's comments • Concerns of Environment Agency 	None	Tamworth Borough Council Legal and General Inland Waterways Association
<p>Matter 9: Lichfield City Centre</p>	Lichfield Civic Society	Lichfield Civic Society
<p>Matter 10: Development Management, Uncertainties and Risks</p>	None	None
<p>Matter 11: Site Allocations in the Plan Site allocations in the Lichfield Area (Sites L1-31) Site allocations in the Burntwood Area (Sites B1-21) Site allocations in the Remainder of the District (Sites NT1-2; R1; F1-2; A1-6; AH1; FZ2-3; GT1; S1; W2-3; H1; and OR1-8)</p>	Burntwood Action Group Essington Park Ltd Metacre Ltd Grasscroft Homes & Property Ltd Miller Homes Davy Developments Ltd FI Read Estate Management Canal and River Trust Hammerwich Action Group	Elford Homes Mr J Duncan M P Smith Burntwood Action Group Hammerwich Action Group Metacre Ltd Tamworth Borough Council South Staffs Water Essington Park Ltd Grasscroft Homes & Property Ltd FI Real Estate Management Ltd
<p>Matter 12: Are there any other issues of soundness which the Examination should cover?</p> <ul style="list-style-type: none"> • Issues arising from the new NPPF <p>Any other soundness issues.</p>	Drayton Manor Park FI Real Estate Management Ltd	Drayton Manor Park Tamworth Borough Council FI Real Estate Management Ltd

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Policy / para Inspector's Matters	What the plan has said	What we have said	What Lichfield's response has been (see rep FC243 in CD1-5) http://www.hwa.uk.com/site/wp-content/uploads/2018/06/Submission-Document-List-31.05.18.pdf	Are we happy? If not, what do we want?	Is there an overlap with the Core Strategy Issues and Options?*	Action: - Support - Withdraw - Let rep stand - More evidence - Appear at Examination
Matter 1, question 1.3 Page 40	Para 1.10 The Council is aware, and is committed to reviewing its Plan in full to address the Greater Birmingham Housing Market Area issues, specifically the shortfall in addressing the housing needs within this area.	a more explicit reference to this [Lichfield Local Plan] review should be made in the Local Plan Allocations Document itself there might also be scope to consider the possibility outlined in the [Greater Birmingham HMA Strategic] Growth Study of increasing densities on sites already allocated	Representation noted. Lichfield District forms part of the Greater Birmingham HMA and consideration will be given to outcomes of the Strategic Growth Study as part of the Local Plan Review. This is in line with paragraph 4.6 of the Local Plan Strategy which commits the Council to an early review of the Local Plan.	Happy with reference to local plan review but Allocations Plan does not address potential to increase densities on allocated sites	Yes	Let rep stand
Policy EMP1: Employment Areas & Allocations (Matter 7, question 7.3?)	Allocates for Use Class B1 (sites F2, A6 and OR6	We presume that the allocation is intended to be for B1(b) and B1(c) uses. The reasoned justification (paragraph 5.2) says that proposals for	<i>“Representation noted. Lichfield District forms part of the Greater Birmingham HMA and consideration will be given to outcomes of the Strategic Growth Study as part of the Local Plan Review. This is in line with paragraph 4.6 of the Local Plan Strategy which commits the</i>	Amendments to the plan for clarification.	Yes – we stated that <i>“If the retail and office requirements set out within the Local Plan Allocations document are to be</i>	Let rep stand

Policy / para Inspector's Matters	What the plan has said	What we have said	What Lichfield's response has been (see rep FC243 in CD1-5) http://www.hwa.uk.com/site/wp-content/uploads/2018/06/Submission-Document-List-31.05.18.pdf	Are we happy? If not, what do we want?	Is there an overlap with the Core Strategy Issues and Options?*	Action: - Support - Withdraw - Let rep stand - More evidence - Appear at Examination
Page 41		B1(a) offices should have regard to CP8 ('Our Centres'). However, this does not justify the unrestricted allocation for B1 uses in the first place, nor is it considered sufficient to ensure that offices are subject to the application of the 'town centre first' approach across the catchment area they serve.	<i>Council to an early review of the Local Plan. The Local Development Strategy sets out that the Council will commence the Local Plan Review in April 2018 and anticipates it will be adopted by 2020."</i> They therefore never really responded to the issues I raised.		<i>used as the basis for the Local Plan Review then Walsall requests that the comments we made in regards to these allocations in response to the Lichfield District Council Local Plan Allocations Focused Changes Consultation on the 19th February 2018 are considered as part of this consultation".</i>	
Policy Lichfield 3: Lichfield Economy and Policy Burntwood 3:	Site S1 is allocated for a mixed-use residential development	It does not appear there is evidence to justify provision for offices outside of the centres of Lichfield and	As above	Amendments to the plan for clarification.	As above	Let rep stand

Policy / para Inspector's Matters	What the plan has said	What we have said	What Lichfield's response has been (see rep FC243 in CD1-5) http://www.hwa.uk.com/site/wp-content/uploads/2018/06/Submission-Document-List-31.05.18.pdf	Are we happy? If not, what do we want?	Is there an overlap with the Core Strategy Issues and Options?*	Action: - Support - Withdraw - Let rep stand - More evidence - Appear at Examination
Burntwood Economy Site S1 (Shenstone 1): Land at Lynn Lane, Shenstone Case 42 Matter 7, question 7.7 and 7.8)	within the Shenstone Neighbourhood Plan (Made 13 December 2016) to provide approximately 50 dwellings and 1000m2 of office/light industrial floor space (Class B1).	at Burntwood. Shenstone Neighbourhood Plane provides for the provision of offices and this is reflected the allocation of site S1 at Lynn Lane. It is considered that the floorspace provided through such 'additional' allocations should be subtracted from the overall quantum of offices to be provided that district's main centres, or that convincing evidence should be provided to justify additional offices without conflicts with policies to support existing centres,				

Policy / para Inspector's Matters	What the plan has said	What we have said	What Lichfield's response has been (see rep FC243 in CD1-5) http://www.hwa.uk.com/site/wp-content/uploads/2018/06/Submission-Document-List-31.05.18.pdf	Are we happy? If not, what do we want?	Is there an overlap with the Core Strategy Issues and Options?*	Action: - Support - Withdraw - Let rep stand - More evidence - Appear at Examination
		including centres in surrounding areas.				
Site LC27 (Matter 7, question 7.7 and 7.8) Page 43	Site LC27 is allocated for 70 dwellings/bulky goods retail	Site LC27 (Former Norgren, Eastern Avenue) should have a clear definition of what would be acceptable under the definition of "bulky goods" and that the plan should set out in what circumstances the sequential and impact tests might be applied if / when other developments come forward in the catchment area, notably the Friarsgate development.	As above	Amendments to the plan for clarification.	As above	Let rep stand
Policy GT1 (matter 3, question 3.5)	Land at Bonehill Road, Mile Oak is allocated for one pitch	the number of traveller pitches to be allocated under	No response	Plan should allocate sufficient pitches to	Yes, because core strategy could re-	Let rep stand

Policy / para Inspector's Matters	What the plan has said	What we have said	What Lichfield's response has been (see rep FC243 in CD1-5) http://www.hwa.uk.com/site/wp-content/uploads/2018/06/Submission-Document-List-31.05.18.pdf	Are we happy? If not, what do we want?	Is there an overlap with the Core Strategy Issues and Options?*	Action: - Support - Withdraw - Let rep stand - More evidence - Appear at Examination
		policy GT1 does not appear to meet the need identified in the Local Plan Strategy, nor that reported in the 'Methodology Paper' of December 2016		meet identified need within the district	assess pitch requirement	

Your ref ADPD WC Response
Our ref
Ask for Ashley Baldwin
Email Ashley.baldwin@lichfielddc.gov.uk



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

Direct Line 01543 308192
Customer Services 01543 308000

FAO Planning Inspector

30 August 2018

Dear Helen,

Lichfield District Council Response to Walsall Council's Written Representation [M1/8]

Lichfield District Council (LDC) acknowledges that the points raised within Walsall Metropolitan Borough Council's (WMBC) written representation [M1/8] were raised in response to the Local Plan Allocations Focused Changes Consultation [Representation Reference: FC243]. LDC prepared a response to representations received as part of the Focused Changes consultation and would like to highlight to the Inspector that WMBC made no further contact to discuss the points raised with Lichfield District Council following the publication of those responses.

Further, following the submission of Walsall Council's written representation [M1/8], LDC attempted to make contact with Walsall Council to arrange a meeting to discuss the points further however no response was received from WMBC following the response sent from LDC on 4 August 2018 (Appendix A). Notwithstanding this, given that WMBC has decided not to appear at the Hearing Sessions, LDC has prepared a more detailed response to the points raised by Walsall to aid the Inspector during the Examination (Appendix B – green column). For clarity, whilst WMBC are critical in their response that LDC did not respond to each of the points raised within their representation, this does not mean these points have been overlooked by LDC.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Ashley Baldwin', written over a light blue horizontal line.

Ashley Baldwin
Spatial Policy & Delivery Manager
Economic Growth



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Appendix A – Email Correspondence between LDC & WC following submission of hearing statements

From: Baldwin, Ashley
Sent: 04 August 2018 20:09
To: Mike Smith (Strategic Planning) <Mike-E.Smith@walsall.gov.uk>
Subject: RE: DtC EiP session

Noted thanks Mike. Phonecall is fine, I am in an appeal on Tuesday, other than that I will be in most of the week.

Ash

Ashley Baldwin

Spatial Policy & Delivery Manager

Lichfield District Council

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

T: 01543 308147

E: ashley.baldwin@lichfielddc.gov.uk

From: Mike Smith (Strategic Planning) [<mailto:Mike-E.Smith@walsall.gov.uk>]
Sent: 03 August 2018 19:11
To: Baldwin, Ashley <Ashley.Baldwin@lichfielddc.gov.uk>
Subject: RE: DtC EiP session

Hi Ashley,

Apologies for the delay in being able to come back to you.

I might have mentioned the DtC as a possible topic, but I was merely saying that we had a letter from your Programme Officer asking if we wanted to attend the Examination in respect of any of the issues. It's attached, but you've probably seen it.

At present we're just going through our reps and where things stand now. It isn't long until the deadline of the 17th, so we might want a phone conversation.

Regards,

Mike Smith
Planning Policy Manager
Regeneration and Development
Economy & Environment Directorate
Walsall Council
Civic Centre, Darwall Street, Walsall WS1 1DG
Email: SmithME@Walsall.gov.uk / Mike-E.Smith@walsall.gov.uk
Team Email: planningpolicy@walsall.gov.uk



Tel: 01922 658024
Fax: 01922 652670
Website: www.walsall.gov.uk

From: Baldwin, Ashley <Ashley.Baldwin@lichfielddc.gov.uk>
Sent: 12 July 2018 15:05
To: Mike Smith (Strategic Planning) <Mike-E.Smith@walsall.gov.uk>
Subject: DtC EIP session

CAUTION: This email originated from outside of the council. Do not click links or open attachments unless you are sure the content is safe.

Mike

Did you say earlier that you have been invited by our Inspector to a DtC session? The reason I ask is that I have not received anything to that effect.

Ash

Ashley Baldwin

Spatial Policy & Delivery Manager

Lichfield District Council

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

T: 01543 308147 **E:** ashley.baldwin@lichfielddc.gov.uk



Appendix B – LDC response to points raised by Walsall Council [M1/8]

Policy / para Inspector's Matters	What the plan has said	What we have said	What Lichfield's response has been (see rep FC243 in CD1-5) http://www.hwa.uk.com/site/wp-content/uploads/2018/06/Submission-Document-List-31.05.18.pdf	Are we happy? If not, what do we want?	Is there an overlap with the Core Strategy Issues and Options?*	Action: - Support - Withdraw - Let rep stand - More evidence - Appear at Examination	Lichfield District Council Response
Matter 1, question 1.3	Para 1.10 The Council is aware, and is committed to reviewing its Plan in full to address the Greater Birmingham Housing Market Area issues, specifically the shortfall in addressing the housing needs within this area.	a more explicit reference to this [Lichfield Local Plan] review should be made in the Local Plan Allocations Document itself there might also be scope to consider the possibility outlined in the [Greater Birmingham HMA Strategic] Growth Study of increasing densities on sites already allocated	Representation noted. Lichfield District forms part of the Greater Birmingham HMA and consideration will be given to outcomes of the Strategic Growth Study as part of the Local Plan Review. This is in line with paragraph 4.6 of the Local Plan Strategy which commits the Council to an early review of the Local Plan.	Happy with reference to local plan review but Allocations Plan does not address potential to increase densities on allocated sites	Yes	Let rep stand	<p>The GBHMA shortfall will be dealt with through the Local Plan Review. The Local Development Scheme sets out the timeframe for the Review and anticipates it will be adopted by December 2020.</p> <p>Lichfield District Council have signed a Statement of Common Ground with Birmingham City Council which confirms it is an appropriate approach to deal with the HMA shortfall as part of the review process.</p>
Policy EMP1: Employment Areas & Allocations (Matter 7, question 7.3?)	Allocates for Use Class B1 (sites F2, A6 and OR6)	We presume that the allocation is intended to be for B1(b) and B1(c) uses. The reasoned justification (paragraph 5.2) says that proposals for B1(a) offices should have regard to CP8 ('Our Centres'). However, this does not justify the unrestricted allocation for B1 uses in the first place, nor is it considered sufficient to ensure that offices are subject to the application of the 'town centre first' approach across the catchment area they serve.	<i>"Representation noted. Lichfield District forms part of the Greater Birmingham HMA and consideration will be given to outcomes of the Strategic Growth Study as part of the Local Plan Review. This is in line with paragraph 4.6 of the Local Plan Strategy which commits the Council to an early review of the Local Plan. The Local Development Strategy sets out that the Council will commence the Local Plan Review in April 2018 and anticipates it will be adopted by 2020."</i> They therefore never really responded to the issues I raised.	Amendments to the plan for clarification.	Yes – we stated that <i>"If the retail and office requirements set out within the Local Plan Allocations document are to be</i>	Let rep stand	<p>Sites F2, A6 and OR6 are allocated for B1 / B2 / B8 uses. The allocation is intended to be flexible to enable employment uses to come forward.</p> <p>Sites A6 and OR6 have both received planning consent and construction is complete. Site F2 benefits from planning permission on part of the site and the remainder of the site is available for appropriate employment uses.</p>

Policy / para Inspector's Matters	What the plan has said	What we have said	What Lichfield's response has been (see rep FC243 in CD1-5) http://www.hwa.uk.com/site/wp-content/uploads/2018/06/Submission-Document-List-31.05.18.pdf	Are we happy? If not, what do we want?	Is there an overlap with the Core Strategy Issues and Options?*	Action: - Support - Withdraw - Let rep stand - More evidence - Appear at Examination	Lichfield District Council Response
Policy Lichfield 3: Lichfield Economy and Policy Burntwood 3: Burntwood Economy Site S1 (Shenstone 1): Land at Lynn Lane, Shenstone (Matter 7, question 7.7 and 7.8)	Site S1 is allocated for a mixed-use residential development within the Shenstone Neighbourhood Plan (Made 13 December 2016) to provide approximately 50 dwellings and 1000m2 of office/light industrial floor space (Class B1).	It does not appear there is evidence to justify provision for offices outside of the centres of Lichfield and at Burntwood. Shenstone Neighbourhood Plan provides for the provision of offices and this is reflected the allocation of site S1 at Lynn Lane. It is considered that the floorspace provided through such 'additional' allocations should be subtracted from the overall quantum of offices to be provided that district's main centres, or that convincing evidence should be provided to justify additional offices without conflicts with policies to support existing centres, including centres in surrounding areas.	As above	Amendments to the plan for clarification.	As above	Let rep stand	The Shenstone Neighbourhood Plan was made in December 2016. Policy CO2: Land at Birchbrook Industrial Estate supports the provision of B1 commercial development on the site as part of a residential – led mixed use development. Policy S1 of the ADPD reflects the relevant adopted Neighbourhood Plan policies. Given the nature of the site and the scale of development allocated through Policy S1 any office provision is like to be ancillary offices on an industrial estate.
Site LC27 (Matter 7, question 7.7 and 7.8)	Site LC27 is allocated for 70 dwellings/bulky goods retail	Site LC27 (Former Norgren, Eastern Avenue) should have a clear definition of what would be acceptable under the definition of "bulky goods" and that the plan should set out in what circumstances the sequential and impact tests might be applied if / when other developments come forward in the catchment area, notably the Friarsgate development.	As above	Amendments to the plan for clarification.	As above	Let rep stand	In accordance with the definition provided on planning portal, bulky goods is defined as goods of a large physical nature that sometimes require large areas for storage or display. It is not considered appropriate to be prescriptive and set out what would be acceptable under the definition of bulky goods within the ADPD. The approach towards retail assessments is set out within the Local Plan Strategy (Policy E1). The ADPD does not seek to introduce a new policy on circumstances where assessments may be required.

Policy / para Inspector's Matters	What the plan has said	What we have said	What Lichfield's response has been (see rep FC243 in CD1-5) http://www.hwa.uk.com/site/wp-content/uploads/2018/06/Submission-Document-List-31.05.18.pdf	Are we happy? If not, what do we want?	Is there an overlap with the Core Strategy Issues and Options?*	Action: - Support - Withdraw - Let rep stand - More evidence - Appear at Examination	Lichfield District Council Response
Policy GT1 (matter 3, question 3.5)	Land at Bonehill Road, Mile Oak is allocated for one pitch	The number of traveller pitches to be allocated under policy GT1 does not appear to meet the need identified in the Local Plan Strategy, nor that reported in the 'Methodology Paper' of December 2016	No response	Plan should allocate sufficient pitches to meet identified need within the District.	Yes, because core strategy could re-assess pitch requirement.	Let rep stand	The Methodology Paper (2016) sets out the approach taken towards allocation sites. Page 6 includes Stage 4: Establishing a Final Schedule of Sites which sets out that three landowners were contacted and only one was willing to have their site allocation (Site GT 21 – 1 Pitch), therefore this is recommended as the only Gypsy and Traveller allocation. Policy GT1 is consistent with the recommendations of the Methodology paper.



APPENDIX D

Local Plan Review Scope Issues and Options Consultation – Summary of Representations

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1	Carol Eyles	1	Plan is important, concern that can be adopted in 18 months	In accordance with the LDS Council is aiming to adopt the Local Plan Review by 2020.
SIO2	Carol Eyles	1	No, a little more than 18 months (2020) is not enough time to make a decision over something so important.	The NPPF requires Local Plans to be drawn up over an appropriate time scale such as 15 years and in accordance with this Council is proposing a 16 year plan period as it is intended the plan will adopted by 2020.
SIO3	Carol Eyles	2	Rural communities/villages should be protected and not built on or around. They offer an escape for the city folk of Birmingham	Comments noted, however it is unclear what evidence base is required.
SIO4	Carol Eyles	3	Brownfield land in Digbeth and Aston should be developed before Birmingham looks to its neighbours for assistance, Staffordshire is not part of Birmingham.	Lichfield District forms part of the Greater Birmingham and Black Country Housing Market Area. As part of the duty to cooperate the Council has committed to engaging with its neighbours to meet the needs within the HMA.
SIO5	Carol Eyles	4	No, does not consider policies 1-4 need to be significantly amended or replaced.	Comments noted.
SIO6	Paul Jenkins	Whole document	Can't determine how many dwellings this proposal is for, and when they will be provided.	Comments noted. Scope, Issues and Options document makes clear that at this stage development requirements are not known and evidence will be prepared to inform the Local Plan Review.
SIO7	Shirley O'Mara	Whole document	Shenstone Neighbourhood Plan should not be overruled. The village has infrastructure issues, other options should be considered.	Objection to key rural settlement in Q24 noted.
SIO8	Carol Eyles	7	Green spaces need to be protected for their health and wellbeing benefits, a strong policy is required to protect existing spaces. Small scale development must come with guaranteed infrastructure.	Comments noted, GI and open will be considered during the Review
SIO9	Steve Taylor	Whole document	Promotes land north of Millbrook Drive, Shenstone for development.	Potential site for inclusion in Local Plan review
SIO10	Lisa Rowlands	Whole document	Current infrastructure cannot cope, doctors are oversubscribed, school is full, with poor access, issues of parking (especially near train station), green belt will be compromised and housing is not affordable. Brownfield sites would be better, to protect agricultural land for food growing.	Consideration relating to evidence base- IDP.
SIO11	Carol Eyles	8	No, urban encroachment is one of the main issues affecting the area	Housing growth is something that the Review will need to address. The impacts of expanding existing urban areas will need to be considered.
SIO12	Carol Eyles	9	No, the vision is not robust enough.	Comments noted however there is limited constructive feedback provided in the response
SIO13	Carol Eyles	10	Friends in Burntwood are unhappy about the lack of infrastructure, particularly that which was promised alongside previous development. Statement about rural sustainability is contradictory, developing rural areas means they are no longer rural.	Consultation feedback from Burntwood indicates that there is a lack of infrastructure. In order developer contributions to support the provision of infrastructure there will be a need to incorporate development within Burntwood.
SIO14	Carol Eyles	12	Unsure how Birmingham is not meeting its needs when there are brownfield sites available. Concerned that they are not being developed due to higher costs. LDC needs to ensure Birmingham has used all available land before land in Lichfield is offered.	Comments noted. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield.
SIO15	Carol Eyles	19	Legal protection of the greenbelt surround villages such as Shenstone, so these kinds of proposals are not allowed in the future.	Comments noted
SIO16	Carol Eyles	21	Yes, keep to a minimum and strictly in character with Lichfield. Remaining small is important for character to attract tourists (including from Birmingham) who come for recreation and a day out.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy.
SIO17	Carol Eyles	22	The challenge is keeping development to a minimum and retaining the character of Lichfield and Staffordshire.	Comment noted.
SIO18	Carol Eyles	23	Absolutely not. "Developing" a rural village, would mean the village is no longer "rural".	Comments noted.
SIO19	Carol Eyles	24	The character of villages needs to be protected and there needs to be clear boundaries between them. They should never be at risk of being swallowed by suburbia.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO20	Carol Eyles	25	These villages and their boundaries need to be legally protected for the future.	Comments noted.
SIO21	Carol Eyles	26	Green belt should be protected and not built on, industrial estates should be developed. Claimed positive benefits of development (such as increased infrastructure) have not materialised in the past at Burntwood. Infrastructure should be delivered before housing. The train line should not be seen as an advantage to developing the area as it is unreliable	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO22	Carol Eyles	27	Keeping Staffordshire rural, as it is a key USP for the area. Wales is a good example to follow.	Comments noted.
SIO23	Carol Eyles	28	Absolutely not, this is by far the worst proposal for all areas concerned.	Comments noted.
SIO24	Carol Eyles	29	Intense development is damaging to the area, to the environment, causes chaos to infrastructure and is wrong on all levels.	Comments noted.
SIO25	Carol Eyles	30	This option should be deleted.	Comment noted.
SIO26	Carol Eyles	31	Yes, industrial site should be kept as small as possible but concentrated in their own areas.	Comments noted
SIO27	Carol Eyles	32	No	Comments noted

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO28	Carol Eyles	33	HS2 will allow people to work in the big cities and "escape" to home to the greenspace of Staffordshire	According to the HS2 Regional Economic Impacts document, September 2013, areas outside Greater London and the Phase Two (north of Greater London) city regions account for around half of the total forecast increase in Britain's economic output; therefore, nearly matching jobs provision between in and outside those cities.
SIO29	Carol Eyles	34	I believe the old industrial estate in Shenstone (Lynn Lane) has been identified as somewhere to build homes. If that is the case then there is no additional space for more employment/industrial.	Inaccurate- within village boundary in a Key Rural Settlement as identified within the adopted Local Plan Strategy.. Within allocated employment area - emerging Local Plan Allocations proposes to remove site from employment area. Site is identified in the made Shenstone Neighbourhood Plan for mixed use development allocation which includes approx. 50 dwellings. The site is proposed to be allocated for housing development within emerging Local Plan Allocations Document. Flood zone 2 (part) 3a (part). Strategic Flood Risk Assessment may be required.
SIO30	Carol Eyles	35	No, stick to current areas and redevelop if needed without making the area bigger.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO31	Carol Eyles	36	Already have issues in numerous villages with massive freight trucks causing problems	Comments noted.
SIO32	Carol Eyles	38	Need to fix current problems. Past roadwork improvements have not lasted even 6 months.	Comments noted
SIO33	Carol Eyles	39	Whilst the roads are important, the bigger, more long term infrastructure needs to be looked at - schools, parkland, travel, cycle ways, walk ways, Dr's, hospitals, banks, post offices, etc.	Comments noted
SIO34	Carol Eyles	43	Villages should be consulted about infrastructure, as they have to live with the results. Residents are key stakeholders.	Comments noted
SIO35	Shirley O'Mara	1	If Local Plan Reviews were planned to cover a period over 15 years ahead instead of 15 years, it could prevent close and confusing repetition of one Local Plan Review always concluding and the next immediately commencing.	The NPPF requires plans to be drawn up over an appropriate timescale such as 15 years and in accordance with this the Council is proposing a 16 year plan period as it is intended the plan will be adopted by 2020.
SIO36	Victoria Moody	21	Empty properties should be used first. Historic properties in and around Birmingham are ideal for development as they are better quality. We should not smother the countryside in poor quality housing. Need to protect the green belt.	Comments noted. It is not considered that empty properties will be sufficient to deliver housing need alone.
SIO37	Victoria Moody	24	People move to villages is because of the rural character. If development is allowed they lose this appeal.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO38	Victoria Moody	25	If no historic properties can be found to renovate then brownfield land should be developed but only to existing limits.	Comments noted.
SIO39	Victoria Moody	28	No. It's going to end up as one massive corridor of building all the way to Birmingham at this rate.	Comments noted.
SIO40	Victoria Moody	34?	What about large traffic? How will large lorries cope with village streets and narrow lanes?	Core Policy 4: Delivering our Infrastructure in the Local Plan Strategy requires infrastructure at the appropriate stage of development.
SIO41	Philippa Kreuser on behalf of Trustees of St. John's Hospital	1	Yes the Plan period of 2020-2036 is appropriate	Comments noted
SIO42	Philippa Kreuser on behalf of Trustees of St. John's Hospital	3	Yes the key strategic cross boundary issues have been identified	Comments noted
SIO43	Philippa Kreuser on behalf of Trustees of St. John's Hospital	4	Yes, policies should be amended where circumstances have changed and additional policies added to ensure NPPF compliance.	Comments noted
SIO44	Philippa Kreuser on behalf of Trustees of St. John's Hospital	11	No. The Local Plan review should not consider the inclusion of a density policy.	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO45	Shirley O'Mara	2	The evidence base needs to clearly distinguish between the needs of the LDC population and the contribution to be given to the needs of the Birmingham or Greater Birmingham populations. Without this separation, any confidence in needs analysis is undermined.	Lichfield District forms part of the Greater Birmingham and Black Country Housing Market Area. As part of the duty to cooperate the Council has committed to engaging with its neighbours to meet the needs within the HMA.
SIO46	Philippa Kreuser on behalf of	12	Yes, LDC should assist in meeting the unmet needs of the Greater Birmingham Housing Market Area, the allocation should be fair and proportionate.	Comments noted. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
	Trustees of St. John's Hospital			
SIO47	Philippa Kreuser on behalf of Trustees of St. John's Hospital	23	Yes, agree that focussing on existing towns and key settlements is an appropriate option.	Comments noted.
SIO48	Philippa Kreuser on behalf of Trustees of St. John's Hospital	25	Option 2 will clearly provide for new housing in the most sustainable settlements. It would consolidate and continue the existing Spatial Strategy for a further 7 years.	Comments noted.
SIO49	Shirley O'Mara	3	No. The Birmingham Strategic Locations Study (BSLS) has over 20 alternative supply sites identified and evaluated and none of those is cross-compared to the LDC proposed growth options. The collaboration approach needs to extend to the assessment and prioritisation of the alternative sites in other local authority areas. Otherwise, what are we comparing the LDC options against? They are presented inside an LDC bubble only, which reduces the credibility of the LDC proposals.	The Strategic Growth Study presents a series of options that can be tested. The Local Plan Review includes the options relevant to Lichfield District. However the Local Plan review is not confined to those options.
SIO50	Shirley O'Mara	4	Yes. The policies in 1.2 should be revised to indicate where LDC housing growth would be acceptable and would prevent LDC having to react to external pressures every five years. Instead, LDC would be proactive.	Comments noted
SIO51	Shirley O'Mara	5	Yes. Those policies applying to Neighbourhood Plans (NP). LDC growth proposals affecting an adopted NP need a separate impact analysis as part of the overall impact assessment. Otherwise, NP's are devalued from inception.	Comments noted, LDC will need to work the those areas that have made NPs where the Review will have an impact
SIO52	Shirley O'Mara	7	Yes. As stated in Q2 and Q4 we need to see LDC needs as distinct from other authority needs and in advance of the five year, re reviews where the housing growth potential, however limited, is to be found in LDC and if available and justified, for external needs.	Lichfield District forms part of the Greater Birmingham and Black Country Housing Market Area. As part of the duty to cooperate the Council has committed to engaging with its neighbours to meet the needs within the HMA.
SIO53	Shirley O'Mara	8	No, you have not identified the exact need for new homes to satisfy LDC needs. The Review has not cross-compared the LDC options to others using the Greater Birmingham Housing Market Area Study. See above for what needs to be done.	There is no requirement for the Review to cross compare the approach of other LPAs. Notwithstanding this LDC actively engage in DtC discussions and where appropriate comment on other LPA plans
SIO54	Shirley O'Mara	9	Agree with LDC vision as it underwrites a specific vision for key settlements. None of the key settlement visions includes excessive growth.	Comments noted
SIO55	Shirley O'Mara	10	Yes, support the LDC Strategic Objectives as not one of the 15 LDC Objectives supports the options for growth set out for an Urban Fringe Extension near Little Aston or a New Settlement at Shenstone.	Comments noted - however the vision nor strategic objectives as currently drafted does not restrict growth across the District.
SIO56	Shirley O'Mara	11	Yes. Well-designed and managed higher densities in existing urban areas are used successfully elsewhere and reduce the need to put pressure on low-density housing supply in the Green Belt.	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO57	Shirley O'Mara	12	LDC should be much more transparent about contributions made to GBHMA each year to date, as a proportion of overall LDC supply and as identified above should be much more transparent about the current proposals. Without this key metric, ambiguity, uncertainty and low confidence in any new proposals will continue.	Comments noted. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield.
SIO58	Shirley O'Mara	13	Yes, small self-build sites should be identified by LDC for affordable ownership options however nationally they make a very marginal contribution to overall supply.	Comments noted. This will be considered further as the Local Plan Review progresses and will be informed by a range of evidence.
SIO59	Shirley O'Mara	14	Yes, an LDC promotion of small pre-purchased sites and grants.	Comments noted.
SIO60	Shirley O'Mara	15	Yes. The lack of a confident and clear traveller site allocation by LDC has led to random applications for traveller sites in the Shenstone Parish Council area. However, sensitive and complex the LDC Review must designate sites so they can deal with random landowner applications more effectively.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence including a Gypsy Traveller Needs Assessment.
SIO61	Shirley O'Mara	16	Only if liaison with Travellers justifies a cross boundary approach. A cross boundary approach on its own is not enough if it does not deliver appropriate solutions	Comments noted.
SIO62	Shirley O'Mara	17	Yes, as they support existing town centre growth	Comments noted
SIO63	Shirley O'Mara	20	The electrification of the infrastructure rail link between Alrewas and Lichfield is an important consideration in the consideration of New Settlements and should be part of the Review considerations. There are other drivers for this consideration, access to the (i) National Arboretum (ii) National Football Training Centre.	Comments noted. New services linking Lichfield Trent Valley And Burton upon Trent including necessary and relevant infrastructure such as electrification, capacity/speed improvements and re-signalling between Lichfield Trent Valley and Wychnor Junction is identified as an infrastructure requirement with the current IDP March 2018, if following consultation with providers and regulators this response remains relevant it will be become an infrastructure requirement articulated through the proposed structure.
SIO64	Mary Jones	2	The evidence needs to show the needs of the LDC population and the contribution to be given to the needs of the Birmingham or Greater Birmingham population separately.	Lichfield District forms part of the Greater Birmingham and Black Country Housing Market Area. As part of the duty to cooperate the Council has committed to engaging with its neighbours to meet the needs within the HMA.
SIO65	Shirley O'Mara	21	Yes. Focussing growth around existing LDC urban areas has the advantage of the using the services and amenities that exist in those areas, with the exception of the northern fringe of Birmingham/Sutton Coldfield. The reason for this exclusion is that all other urban areas proposals have the existing infrastructure /amenities/services to merit consideration. The Little Aston area has no infrastructure /amenities/services to justify inclusion as an urban area appropriate for growth.	Comments noted. Infrastructure provision will be considered as part of the testing of each option.
SIO66	Shirley O'Mara	23	No. Agree with growth focussed on town centres only. This approach has been successfully taken to the supply of housing in the current LDC Review. There is no evidence that what are named as key rural settlements have any capacity to sustain any meaningful growth.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO67	Mary Jones	3	No. I understand that the Birmingham Strategic Locations Study has over 20 alternative supply sites identified and evaluated. It seems that none of those are cross-compared to the LDC proposed growth options which reduces the credibility of the LDC proposals.	The Strategic Growth Study presents a series of options that can be tested. The Local Plan Review includes the options relevant to Lichfield District. However the Local Plan review is not confined to those options.
SIO68	Glyn Constantine	1	If the Local Plan Reviews were planned to cover a period over 15 years ahead instead of 15 years, it could prevent close and confusing repetition of one Local Plan Review always concluding and the next immediately commencing.	Comments noted
SIO69	Glyn Constantine	2	Evidence base needs to distinguish between the needs of the LDC population and the needs of the Birmingham, Tamworth or Greater Birmingham populations. Without separation, any confidence in needs analysis is undermined.	Lichfield District forms part of the Greater Birmingham and Black Country Housing Market Area. As part of the duty to co-operate the Council has committed to engaging with its neighbours to meet the needs within the HMA.
SIO70	Shirley O'Mara	24	No. No evidence of capacity to sustain any meaningful growth in these locations. More appropriate alternative exist.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO71	Glyn Constantine	3	The Birmingham Strategic Locations Study has over 20 alternative supply sites identified and evaluated, none of those compared with LDC growth options. Need to assess alternative sites in other authority areas as presenting only Lichfield sites reduces credibility of proposals.	The Strategic Growth Study presents a series of options that can be tested. The Local Plan Review includes the options relevant to Lichfield District. However the Local Plan review is not confined to those options.
SIO72	Mary Jones	4	Yes. The policies in 1.2 should be revised to indicate where LDC housing growth going forward.	Comments noted
SIO73	Shirley O'Mara	25	Yes. Growth in existing town centres and Growth Settlements outside the Green Belt.	Comments noted.
SIO74	Glyn Constantine	4	Yes. The policies in 1.2 should be revised to indicate where LDC housing growth would be acceptable and would prevent LDC having to react to external pressures every five years. Instead, LDC would be proactive.	Comments noted
SIO75	Glyn Constantine	5	LDC growth proposals affecting an adopted NP need a separate impact analysis as part of the overall impact assessment. Otherwise, NP's are devalued from inception.	Comments noted, LDC will need to work the those areas that have made NPs where the Review will have an impact
SIO76	Glyn Constantine	7	As stated in Q2 and Q4 we need to see LDC needs as distinct from other authority needs and in advance of the five year, reviews where the housing growth potential, however limited, is to be found in LDC and if available and justified, for external needs.	Lichfield District forms part of the Greater Birmingham and Black Country Housing Market Area. As part of the duty to co-operate the Council has committed to engaging with its neighbours to meet the needs within the HMA.
SIO77	Mary Jones	5	Yes. LDC growth proposals affecting neighbourhood plans need a separate impact analysis as part of the overall impact assessment.	Comments noted, LDC will need to work the those areas that have made NPs where the Review will have an impact
SIO78	Glyn Constantine	8	No, you have not identified the exact need for new homes to satisfy LDC needs. The Review has not cross-compared the LDC options to others using the Greater Birmingham Housing Market Area Study.	There is no requirement for the Review to cross compare the approach of other LPAs. Notwithstanding this LDC actively engage in Dtc discussions and where appropriate comment on other LPA plans
SIO79	Glyn Constantine	9	Agree with LDC vision as it underwrites a specific vision for key settlements. None of the key settlement visions includes excessive growth.	Comments noted
SIO80	Glyn Constantine	10	Yes, support the Strategic Objectives as not one of them supports the options for growth set out for an Urban Fringe Extension near Little Aston which is very important or a New Settlement at Shenstone	Comments noted - however the vision nor strategic objectives as currently drafted does not restrict growth across the District.
SIO81	Shirley O'Mara	26	Rural settlements are not appropriate as an overall housing supply strategy. They do not contain the services or infrastructure requirements for growth.	Comments noted.
SIO82	Glyn Constantine	12	LDC should be much more transparent about contributions made to GBHMA each year to date and should be much more transparent about the current proposals	Comments noted. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield.
SIO83	Glyn Constantine	13	Yes, small self-build sites should be identified by LDC for affordable ownership options however nationally they make a very marginal contribution to overall supply.	Comments noted. This will be considered further as the Local Plan Review progresses and will be informed by a range of evidence.
SIO84	Glyn Constantine	14	Yes, an LDC promotion of small pre-purchased sites and grants.	Comments noted.
SIO85	Mary Jones	7	Yes. We need to see LDC needs as distinct from other authority needs.	Lichfield District forms part of the Greater Birmingham and Black Country Housing Market Area. As part of the duty to co-operate the Council has committed to engaging with its neighbours to meet the needs within the HMA.
SIO86	Glyn Constantine	16	Only if liaison with Travellers justifies a cross boundary approach. A cross boundary approach on its own is not enough if it does not deliver appropriate solutions.	Comments noted.
SIO87	Glyn Constantine	17	Yes as they support existing town centre growth and regeneration	Comments noted
SIO88	Glyn Constantine	18	No comments as do not understand question	N/A
SIO89	Shirley O'Mara	28	No. The Shenstone Area New Settlement should be omitted as it is (a) the only new settlement option of three in the Green Belt (b) is the only new settlement option breaching the safeguarding from encroachment policy (c) is the only new settlement option breaching Strategic Separation policy and (d) is the only new settlement option breaching Local Separation policy. These are designations made clear in the GBHMA, there is no reference or impact assessment of these designations in the LDC review. The credibility Birmingham Growth Study assertion that a new settlement around Shenstone would have "good access to public transport" because it would be 1km (0.6 miles) from the nearest rail station to Birmingham must also be challenged. The challenge must be made on the accuracy of the distance assumed and station capacity. The assertion is made as part of a Venn diagram in the Growth Study.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. The Strategic Growth Study is one piece of this evidence and provides a number of options for authorities to test, these are incorporated into the Scope, Issues & Options document.
SIO90	Glyn Constantine	19	No comment	N/A

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO91	Glyn Constantine	20	Electrification of the rail link between Alrewas and Lichfield and towards Burton is an important consideration for New Settlements. Other drivers for this consideration are access to the National Arboretum and the National Football Training Centre.	Comments noted. New services linking Lichfield Trent Valley And Burton upon Trent including necessary and relevant infrastructure such as electrification, capacity/speed improvements and re-signalling between Lichfield Trent Valley and Wychnor Junction is identified as an infrastructure requirement with the current IDP March 2018, if following consultation with providers and regulators this response remains relevant it will be become an infrastructure requirement articulated through the proposed structure.
SIO92	Glyn Constantine	21	Yes. Focussing growth around existing urban areas has the advantage of the using the services and amenities that exist in those areas, with the exception of the northern fringe of Birmingham/Sutton Coldfield. The Little Aston area has no infrastructure to justify inclusion.	Comments noted. Infrastructure provision will be considered as part of the testing of each option.
SIO93	Glyn Constantine	22	No comment	N/A
SIO94	Glyn Constantine	23	No. Agree with growth focused on town centres only. There is no evidence that what are named as key rural settlements have any capacity to sustain any meaningful growth.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO95	Glyn Constantine	24	No. No evidence of capacity to sustain any meaningful growth in these locations. More appropriate alternative exist	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO96	Glyn Constantine	25	Yes. Growth in existing town centres and Growth Settlements outside the Green Belt.	Comments noted.
SIO97	Glyn Constantine	26	Rural settlements are not appropriate as they do not contain the services or infrastructure requirements for growth.	Comments noted.
SIO98	Glyn Constantine	27	No comment	N/A
SIO99	Glyn Constantine	28	Shenstone New Settlement should be omitted as it in the Green Belt breaches the safeguarding from encroachment policy and breaches Strategic and Local Separation policy. These are designations made clear in the GBHMA, there is no reference or impact assessment of these designations in the LDC review. The Birmingham Growth Study asserts that a new settlement around Shenstone would have "good access to public transport" because it would be 1km (0.6 miles) from the nearest rail station to Birmingham This should be challenged on the accuracy of the distance assumed and station capacity.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. The Strategic Growth Study is one piece of this evidence and provides a number of options for authorities to test, these are incorporated into the Scope, Issues & Options document.
SIO100	Shirley O'Mara	29	The Alrewas/Fradley and Thorpe Constantine sites do not have the location disadvantages identified above in response to Q28.	Comments noted.
SIO101	Mary Jones	10	Yes, I support the LDC Strategic Objectives as none of the 15 LDC Objectives supports the creation of a new settlement at Shenstone.	Comments noted - however the vision nor strategic objectives as currently drafted does not restrict growth across the District.
SIO102	Shirley O'Mara	30	Yes, comparisons of Alrewas/Fradley and Thorpe Constantine sites against other GBHMA new settlement sites.	Comment noted.
SIO103	Shirley O'Mara	31	Yes, as the most appropriate employment development access and capacity exists in these locations.	Comments noted
SIO104	Mary Jones	12	Residents should be made aware of LDC's contributions to the GBHMA each year, expressed as a proportion of overall LDC supply.	Comments noted. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield.
SIO105	Glyn Constantine	29	The Alrewas/Fradley and Thorpe Constantine sites do not have the location disadvantages identified above in response to Q28.	Comments noted.
SIO106	Glyn Constantine	30	Yes, comparisons of Alrewas/Fradley and Thorpe Constantine sites against other GBHMA new settlement sites.	Comment noted.
SIO107	Glyn Constantine	31	Yes, as the most appropriate employment development access and capacity exists in these locations.	Comments noted
SIO108	Glyn Constantine	32	No comment	No comment.
SIO109	Glyn Constantine	33	No comment	Comments noted
SIO110	Shirley O'Mara	34	No, do not agree because of the inclusion of a new employment location in Shenstone. Shenstone has an existing employment area (Industrial Estate) with long-term vacancy rates due to unattractiveness in its location, space standards, building structure ages and the local infrastructure cannot sustain any increase in HGV volumes. Site turn over and current occupants' relocation intentions further substantiate this.	Disagree. Regeneration of employment in Shenstone supports its key rural settlement status and Policy Shen3: Shenstone Economy in the Local Plan Strategy.
SIO111	Glyn Constantine	34	No, do not agree because of the inclusion of a new employment location in Shenstone. Shenstone has an existing employment area with long-term vacancy rates due to unattractiveness in its location, space standards, building structure ages and the local infrastructure cannot sustain any increase in HGV volumes. Site turn over and current occupants' relocation intentions further substantiate this.	Disagree. Regeneration of employment in Shenstone supports its key rural settlement status and Policy Shen3: Shenstone Economy in the Local Plan Strategy.
SIO114	Glyn Constantine	37	No comment	No comment.
SIO115	Glyn Constantine	38	See question 20	No comment.
SIO116	Glyn Constantine	39	Absolutely important	Comments noted.
SIO117	Glyn Constantine	6	No comment	No comment.
SIO118	Glyn Constantine	11	Well-designed and managed higher densities in existing urban areas are used successfully elsewhere and reduce the need to put pressure on low-density housing supply in the Green Belt.	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO119	Glyn Constantine	15	The lack of a traveller site allocation has led to random applications for traveller sites in the Shenstone area. The Review must designate sites.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence including a Gypsy Traveller Needs Assessment.
SIO120	Glyn Constantine	40	No comments	No comment
SIO121	Glyn Constantine	41	No comments	No comment
SIO122	Glyn Constantine	42	No comments	Comments noted.
SIO123	Glyn Constantine	43	No comments	No Comment
SIO124	Shirley O'Mara	38	The electrification of the infrastructure rail link between Alrewas and Lichfield is an important consideration in the consideration of New Settlements and should be part of the Review considerations. There are other drivers for this consideration, access to the (i) National Arboretum (ii) National Football Training Centre.	Comments noted. New services linking Lichfield Trent Valley And Burton upon Trent including necessary and relevant infrastructure such as electrification, capacity/speed improvements and re-signalling between Lichfield Trent Valley and Wychnor Junction is identified as an infrastructure requirement with the current IDP March 2018, if following consultation with providers and regulators this response remains relevant it will become an infrastructure requirement articulated through the proposed structure.
SIO125	Mary Jones	23	No. I don't believe that there is any evidence that the "key rural settlements" specified have any capacity to sustain significant growth.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO126	Shirley O'Mara	39	Yes, it is critical	Comments noted
SIO127	Mary Jones	24	No. Shenstone has an approved Neighbourhood Plan. As stated by the Local Plan, Shenstone should "accommodate a proportionate level of growth which addresses local need whilst maintaining a self-contained community with clear physical boundaries". Lichfield Council's catalogue of sites for house building shows the whole of the Shenstone business park as "developable". The Shenstone NP researched Business Park vacancy rates and unit short term letting of the industrial units, showing the potential for a change of use to housing. This does not seem to have been taken into consideration.	Comments noted. It should be noted that the SHLAA is a high level strategic document and is clear that a sites assessment as 'deliverable/developable' does not mean that the site would necessarily achieve allocation or planning permission. The SHLAA does not apply policy constraints, such as employment land designations, as part of its assessment process.
SIO128	Mary Jones	26	Shenstone should not be considered for housing as it does not contain the services or infrastructure to support any significant growth.	Comments noted.
SIO129	Mary Jones	28	Shenstone New Settlement should be omitted as it in the Green Belt, breaches the safeguarding from encroachment policy and breaches Strategic and Local Separation policy. These are designations made clear in the GBHMA; there is no reference or impact assessment of these designations in the LDC review. Shenstone already has major problems with insufficient parking at the station to support the existing rail users. It is totally unacceptable to assume that the station (and the village) could cope with a significant increase in users.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. The Strategic Growth Study is one piece of this evidence and provides a number of options for authorities to test, these are incorporated into the Scope, Issues & Options document.
SIO130	Mary Jones	34	No, I do not agree because of the inclusion of a new employment location in Shenstone. Shenstone has an existing employment area with long-term vacancy rates due to its impractical location and the age and quality of its buildings and roadways. The local infrastructure cannot sustain any increase in the already dangerous levels of HGV traffic through the village.	Disagree. Regeneration of employment in Shenstone supports its key rural settlement status and Policy Shen3: Shenstone Economy in the Local Plan Strategy. Core Policy 4: Delivering our Infrastructure in the Local Plan Strategy requires infrastructure at the appropriate stage of development.
SIO131	Philippa Kreuser on behalf of Mr P Smith	1	Yes the Plan period of 2020 - 2036 is appropriate	Comments noted
SIO132	Philippa Kreuser on behalf of Mr P Smith	2	The Rural Settlement Sustainability Study should be reviewed and revised to ensure the provision of services and facilities in the District's Villages is up to date.	Comments noted, a review of the Rural Settlement Sustainability Study will be considered
SIO133	Philippa Kreuser on behalf of Mr P Smith	3	Yes the key strategic cross boundary issues have been identified	Comments noted
SIO134	Philippa Kreuser on behalf of Mr P Smith	4	Yes, policies should be amended where circumstances have changed and additional policies added to ensure NPPF compliance.	Comments noted
SIO135	Philippa Kreuser on behalf of Mr P Smith	11	No - the Local plan Review should not consider the inclusion of a density policy	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO136	Philippa Kreuser on behalf of Mr P Smith	12	Yes, Lichfield District Council should assist in meeting the unmet needs of the Greater Birmingham Housing Market Area. The allocation should be fair and proportionate.	Comments noted. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield.
SIO137	Philippa Kreuser on behalf of Mr P Smith	21	No. Town focussed development is not an appropriate growth option for the District.	Comments noted.
SIO138	Philippa Kreuser on behalf of Mr P Smith	23	Yes, agree that focusing development around the existing towns and Key Rural Settlements is an appropriate option.	Comments noted.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO139	Philippa Kreuser on behalf of Mr P Smith	24	Agree with the identification of the 7 Key Villages, including Armitage with Handsacre.	Comments noted.
SIO140	Philippa Kreuser on behalf of Mr P Smith	25	Option 2 will clearly provide for new housing in the most sustainable settlements. It would consolidate and continue the existing Spatial Strategy for a further 7 years. This growth option helps to support rural services and facilities. It provides house purchasers with a choice of houses in rural and urban locations.	Comments noted.
SIO141	Philippa Kreuser on behalf of South Staffordshire Water PLC	1	Yes the Plan period of 2020 - 2036 is appropriate	Comments noted
SIO142	Philippa Kreuser on behalf of South Staffordshire Water PLC	2	The Rural Settlement Sustainability Study should be reviewed and revised to ensure the provision of services and facilities in the District's Villages is up to date.	Comments noted, a review of the Rural Settlement Sustainability Study will be considered
SIO143	Philippa Kreuser on behalf of South Staffordshire Water PLC	3	Yes the key strategic cross boundary issues have been identified	Comments noted
SIO144	Philippa Kreuser on behalf of South Staffordshire Water PLC	4	Yes, policies should be amended where circumstances have changed and additional policies added to ensure NPPF compliance.	Comments noted
SIO145	Philippa Kreuser on behalf of South Staffordshire Water PLC	11	No - the Local plan Review should not consider the inclusion of a density policy	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO146	Philippa Kreuser on behalf of South Staffordshire Water PLC	12	Yes, Lichfield District Council should assist in meeting the unmet needs of the Greater Birmingham Housing Market Area. The allocation should be fair and proportionate.	Comments noted. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield.
SIO147	Philippa Kreuser on behalf of South Staffordshire Water PLC	23	Yes, agree that focusing development around the existing towns and Key Rural Settlements is an appropriate option.	Comments noted.
SIO148	Philippa Kreuser on behalf of South Staffordshire Water PLC	25	Option 2 will clearly provide for new housing in the most sustainable settlements. It would consolidate and continue the existing Spatial Strategy for a further 7 years. This growth option helps to support rural services and facilities. It provides house purchasers with a choice of houses in rural and urban locations.	Comments noted.
SIO149	Philippa Kreuser on behalf of Elford Homes Ltd	1	Yes the Plan period of 2020 - 2036 is appropriate	Comments noted
SIO150	Philippa Kreuser on behalf of Elford Homes Ltd	2	The Rural Settlement Sustainability Study should be reviewed and revised to ensure the provision of services and facilities in the District's Villages is up to date.	Comments noted, a review of the Rural Settlement Sustainability Study will be considered
SIO151	Philippa Kreuser on behalf of Elford Homes Ltd	3	Yes the key strategic cross boundary issues have been identified	Comments noted
SIO152	Philippa Kreuser on behalf of Elford Homes Ltd	4	Yes, policies should be amended where circumstances have changed and additional policies added to ensure NPPF compliance.	Comments noted
SIO153	Philippa Kreuser on behalf of Elford Homes Ltd	11	No - the Local plan Review should not consider the inclusion of a density policy	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO154	Philippa Kreuser on behalf of Elford Homes Ltd	12	Yes, Lichfield District Council should assist in meeting the unmet needs of the Greater Birmingham Housing Market Area. The allocation should be fair and proportionate.	Comments noted. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield.
SIO155	Philippa Kreuser on behalf of Elford Homes Ltd	21	No. Town focussed development is not an appropriate growth option for the District.	Comments noted.
SIO156	Philippa Kreuser on behalf of Elford Homes Ltd	23	Yes, agree that focusing development around the existing towns and Key Rural Settlements is an appropriate option.	Comments noted.
SIO157	Philippa Kreuser on behalf of Elford Homes Ltd	24	Agree with the identification of the 7 Key Rural Villages, including Whittington.	Comments noted.
SIO158	Philippa Kreuser on behalf of Elford Homes Ltd	25	Option 2 will clearly provide for new housing in the most sustainable settlements. It would consolidate and continue the existing Spatial Strategy for a further 7 years. This growth option helps to support rural services and facilities. It provides house purchasers with a choice of houses in rural and urban locations.	Comments noted.
SIO159	Philippa Kreuser on behalf of Mr M Fateh	1	Yes the Plan period of 2020 - 2036 is appropriate	Comments noted
SIO160	Philippa Kreuser on behalf of Mr M Fateh	2	The Rural Settlement Sustainability Study should be reviewed and revised to ensure the provision of services and facilities in the District's Villages is up to date.	Comments noted, a review of the Rural Settlement Sustainability Study will be considered
SIO161	Philippa Kreuser on behalf of Mr M Fateh	3	Yes the key strategic cross boundary issues have been identified	Comments noted
SIO162	Philippa Kreuser on behalf of Mr M Fateh	4	Yes, policies should be amended where circumstances have changed and additional policies added to ensure NPPF compliance.	Comments noted
SIO163	Philippa Kreuser on behalf of Mr M Fateh	11	No - the Local plan Review should not consider the inclusion of a density policy	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO164	Philippa Kreuser on behalf of Mr M Fateh	12	Yes, Lichfield District Council should assist in meeting the unmet needs of the Greater Birmingham Housing Market Area. The allocation should be fair and proportionate.	Comments noted. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield.
SIO165	Philippa Kreuser on behalf of Mr M Fateh	21	No. Town focussed development is not an appropriate growth option for the District.	Comments noted.
SIO166	Philippa Kreuser on behalf of Mr M Fateh	23	Yes, agree that focusing development around the existing towns and Key Rural Settlements is an appropriate option. However, the growth strategy should not preclude housing development coming forward in the smaller settlements of the District.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO167	Philippa Kreuser on behalf of Mr M Fateh	25	The emerging Residential Growth Strategy for the District must now be restrictive. Although the policy will clearly aim to locate the majority of new housing development in the most sustainable settlements of the District, it should not preclude contributions coming forward from smaller settlements.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO168	CT Planning	1	Yes the Plan period of 2020 - 2036 is appropriate	Comments noted
SIO169	CT Planning	2	The Rural Settlement Sustainability Study should be reviewed and revised to ensure the provision of services and facilities in the District's Villages is up to date.	Comments noted, a review of the Rural Settlement Sustainability Study will be considered
SIO170	CT Planning	3	Yes the key strategic cross boundary issues have been identified	Comments noted
SIO171	CT Planning	4	Yes, policies should be amended where circumstances have changed and additional policies added to ensure NPPF compliance.	Comments noted
SIO172	CT Planning	7	Should add new policies relating to the provision of self-build housing, roadside service areas and residential infill in the Green Belt so that the Plan is in full compliance with the NPPF.	The Council will give these matters consideration as part of the review, in particular focusing on the requirements arising from the NPPF and NPPG.
SIO173	CT Planning	11	No - the Local plan Review should not consider the inclusion of a density policy	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase densities. This will be considered further as the Local Plan review progresses.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO174	CT Planning	12	Yes, Lichfield District Council should assist in meeting the unmet needs of the Greater Birmingham Housing Market Area. The allocation should be fair and proportionate.	Comments noted. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield.
SIO175	CT Planning	18	Caution should be exercised not to over-produce Development Plan documents as part of the Review. The Lichfield Local Plan itself should be the "go to" document which covers, comprehensively, the development proposals for the District rather than producing a collection of additional and unnecessary DPDs.	Comments noted. The Council is committed to preparing the Local Plan Review and the most appropriate supporting documents and evidence base will be considered as the review progresses.
SIO176	CT Planning	21	No Town focussed development is not an appropriate growth option for the District.	Comments noted.
SIO177	CT Planning	19	The following policies should be included; a policy to address the provision of Roadside Services Areas in the District and a policy that allows for the filling of a gap within an otherwise built-up frontage, by the erection of up to two dwellings within "infill" villages. The NPPF states (paragraph 31) that Local Authorities should develop strategies for the provision of roadside facilities. In Lichfield District there are a number of villages that are washed over by Green Belt, which could accommodate one or two houses within a small gap within an otherwise built up frontage. Such limited development would contribute to sustaining the limited services still available within the villages without undermining the purposes of including the villages in the Green Belt.	Comments noted. The inclusion of new policies will be considered as the Local Plan Review progresses.
SIO178	CT Planning	25	Without greater knowledge of the proposed housing numbers for the plan period it is somewhat premature to choose a residential growth strategy.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the consideration of the housing requirement for the area.
SIO179	CT Planning	13	A policy should be included which allocates serviced sites for prospective self and custom builders. Such a policy would assist development of lower cost market housing, support local tradesmen, increase the diversity of housing supply and encourage sustainable construction methods.	Comments noted. This will be considered further as the Local Plan Review progresses and will be informed by a range of evidence.
SIO180	CT Planning	23	Agree that focussing development around the existing towns and Key Rural Settlements is an appropriate option for growth for the District.	Comments noted.
SIO181	CT Planning	24	Agree with the identification of the 7 Key Villages from the Lichfield Local Plan Strategy. Suggest that Key Village status should be extended to other settlements in the District, for example Kings Bromley, Little Aston and Hill Ridware.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO182	Matt Lambert	3	There is no mention of brownfield area in this part of the report. The rehabilitation of the brownfield area should be prioritised over building on the green belt. It is not as profitable but the environment and protection of nature must come before money. There should be a policy to help prioritise the rehabilitation and the building of dwellings on brownfield area in each council.	Comments noted, it is national policy to prioritise the development of brownfield land, however the land will need to be suitable, achievable and developable
SIO183	Matt Lambert	7	There is a need for a brownfield management policy to prioritise the area for houses or other developments. There is a need for a policy to manage unoccupied dwellings. Houses which have not been occupied over 2 or 3 should have penalties or taxes to make sure they are used.	Brownfield first is set out within the NPPF. The Local Plan is not the appropriate mechanism to review empty homes
SIO184	Matt Lambert	11	There is a need for a density policy when building new development. Villages with low density of dwellings should keep this as per their identity. If development with density of housing is over the villages / surrounding density, this will affect rural villages, affect village image and may affect house prices.	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO185	Matt Lambert	21	Agrees growing the urban area is a way to have more dwellings. However, there is a need to keep boundaries between the urban area and rural villages. It would be unfortunate to see villages losing their identity and becoming part of the urban area.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy.
SIO186	Matt Lambert	23	Agrees growing the urban area is a way to have more dwellings. However, there is a need to keep boundaries between the urban area and rural villages. It would be unfortunate to see villages losing their identity and becoming part of the urban area. There is a need not to destroy the green belt and fields around the key settlement area and minimise the impact of new dwellings. The number of houses per square hectare should match the average density of the village to keep the same identity.	Comments noted.
SIO187	Matt Lambert	26	There are several settlements which are close to good road infrastructure which we don't try to development such as Wall, Weeford, Hints. Why not develop these areas to be come a key settlement area with schools, shops etc. People in these areas have to travel to access schools, shops etc. To minimise the environmental impact it would be positive to have better facilities closer.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO188	Matt Lambert	28	This option is not acceptable. The urban area will take over rural villages. Villages like Shenstone will lose its identity due to higher density go uses which will result in more crime, loss of wildlife, green spaces and lifestyle. House prices will be affected. Development must take a very slow pace to be recognised and to have a lower impact on the environment, countryside and village identity.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO189	Matt Lambert	29	This option is not acceptable. The urban area will take over rural villages. Villages like Shenstone will lose its identity due to higher density go uses which will result in more crime, loss of wildlife, green spaces and lifestyle. House prices will be affected. Development must take a very slow pace to be recognised and to have a lower impact on the environment, countryside and village identity.	Comments noted.
SIO190	Matt Lambert	30	This option is not acceptable. The urban area will take over rural villages. Villages like Shenstone will lose its identity due to higher density go uses which will result in more crime, loss of wildlife, green spaces and lifestyle. House prices will be affected. Development must take a very slow pace to be recognised and to have a lower impact on the environment, countryside and village identity.	Comment noted.
SIO191	Jon Flowith	1	There are arguments for a longer period.	Comments noted
SIO192	Jayne Wilson	2	blank	N/A
SIO193	Jayne Wilson	1	Local Plan reviews should be planned to cover a period over 15 years ahead instead of 15 years it could prevent close and confusing repetition of one local plan review always concluding and the next immediately commencing.	Comments noted
SIO194	Jayne Wilson	3	blank	N/A

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO195	Jayne Wilson	4	blank	N/A
SIO196	Jayne Wilson	5	blank	N/A
SIO197	Jayne Wilson	8	blank	N/A
SIO198	Jayne Wilson	9	blank	N/A
SIO199	Jayne Wilson	10	blank	N/A
SIO200	Jayne Wilson	11	blank	N/A
SIO201	Jayne Wilson	12	blank	N/A
SIO202	Jayne Wilson	13	blank	N/A
SIO203	Jayne Wilson	14	blank	N/A
SIO204	Jayne Wilson	15	blank	N/A
SIO205	Jayne Wilson	17	blank	N/A
SIO206	Jayne Wilson	20	blank	N/A
SIO207	Jayne Wilson	21	blank	N/A
SIO208	Jayne Wilson	23	blank	N/A
SIO209	Jayne Wilson	24	blank	N/A
SIO210	Jayne Wilson	25	blank	N/A
SIO211	Jayne Wilson	26	blank	N/A
SIO212	Jayne Wilson	28	blank	N/A
SIO213	Jayne Wilson	29	blank	N/A
SIO214	Jayne Wilson	30	blank	N/A
SIO215	Jayne Wilson	31	blank	N/A
SIO216	Jayne Wilson	34	blank	N/A
SIO217	Jayne Wilson	38	blank	No comment
SIO218	Jayne Wilson	39	blank	No comments
SIO219	Richard Cox	10	blank	N/A
SIO220	Brian Morris	Whole document	<p>Responds to consultation questions opposing development in Shenstone and appends further questions which he considers to be fundamentally important.</p> <ol style="list-style-type: none"> 1. National Policy - this can only be tackled at a National level. 2. Greenbelt - plans will create more fragmented farmland uneconomic to farm 3. Transport - Wall island roundabout and A5127 cannot cope with rush hour and there is insufficient parking at Shenstone for the current commuters 4. New Town - centre of Shenstone is clearly not large enough to be the centre of a town of say 30,000 5. Democracy - if we have only just learnt of these proposals we must be allowed sufficient time to make a considered response for the process to be democratised 6. Greater Birmingham - is it intended the New Town becomes part of Greater Birmingham? If so our needs are likely to be ignored by the perceived needs of Birmingham 	<p>As stated at paragraph 1.24, page 6 of the consultation document; Lichfield District is part of the Greater Birmingham Housing Market Area (GBHMA). Paragraph 24 of the Revised NPPF requires local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries. Paragraph 25 states strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans. They should also engage with their local communities and relevant bodies including Local Enterprise Partnerships, Local Nature Partnerships, county councils, infrastructure providers, elected Mayors and combined authorities (in cases where Mayors or combined authorities do not have plan-making powers). Paragraph 26 further requires effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere. But Lichfield District Council is still preparing its own, not joint, Local Plan.</p>
SIO221	Gillian Lem	Whole document	<p>Requests a stop on overdevelopment in Lichfield and Burntwood to aid delivery of affordable homes. Suggests instead a cap on the ability of homeowners to extend existing smaller homes to enable them to continue to provide small affordable properties. Concerned Burntwood will become part of an urban sprawl without green spaces, out of town shopping and factory development similar to Wolverhampton. Hope Burntwood is able to maintain it's identity and not become part of the Black Country. Concerns around highway infrastructure being able to take few growth as it is already suffering from neglect. Burntwood is an area of older people once baby boomers die there will be a glut of properties. Homes in St Matthews estate are lovely and it should be these types of homes that should be built. Freeing up the housing chain is important so that existing affordable can be used by the most appropriate people. Mile after mile of soulless affordable housing estates were built in the 1960s and these homes have not stood the test of time unlike the older well built semis. Keep these homes as built. Refuse permission for the extra bedroom extensions and the need for only having to build affordable homes will disappear.</p>	<p>Highway infrastructure is covered by the Infrastructure Delivery Plan appendix. The Council monitors the size, type and tenure of housing needed for different groups in the community as it should be assessed and reflected in planning policies in conformity with the Revised NPPF, including property extensions, which reduce the need for larger new properties on greenfield land, where occupiers have identified a need for more space.</p>

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO222	Tamworth Borough Council	1	The plan period is appropriate for Lichfield, however the current adopted Tamworth Local Plan runs to 2031 and so we would like to see proposals related to meeting Tamworth's unmet need also run to 2031.	Comments noted, consideration of the Tamworth adopted plan should be accounted for in the Local Plan Review.
SIO223	Tamworth Borough Council	2	We would like to see an update to the infrastructure evidence. In particular it would be useful to include a strategic infrastructure study incorporating LDC, TBC, NWBC and Staffordshire and Warwickshire County Councils.	Comments noted, it is agreed that infrastructure work is required to inform the development of the Local Plan Review
SIO224	Tamworth Borough Council	3	We welcome the reference to the potential for join plan making to resolve cross boundary issues.	Comments noted
SIO225	Tamworth Borough Council	6	Map 15.1 North of Tamworth Key Diagram would be required to be updated to reflect the current situation in relation to Anker Valley, the strategic new links and developments within Lichfield to the north of Tamworth.	Comments noted - policy maps will need to be produced to support the Review
SIO226	Tamworth Borough Council	7	No specific additional policies are proposed at this time.	Comments noted
SIO227	Tamworth Borough Council	9	We would agree that the vision and approach remain broadly relevant but would like to see a specific reference to meeting Tamworth's unmet needs being retained within any revised vision rather than it being included within any reference to meeting the unmet need arising from the HMA.	TBC unmet need is part of the wider GBHMA need
SIO228	Tamworth Borough Council	11	Yes, the Local Plan Review should consider the inclusion of a density policy to ensure the efficient and effective use of land.	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO229	Tamworth Borough Council	12	The adopted Tamworth Local Plan 2006-2031 shows an unmet housing need of 1,825 dwellings. Whilst we appreciate that the HMA growth study takes account of Tamworth's unmet need and could result in that need being met within the wider HMA area; until such time as the HMA authorities agree to meet the shortfall, the need will not be addressed and we would like to see a continued commitment from LDC (in conjunction with North Warwickshire Borough Council) to deliver Tamworth's unmet need. Whilst there is predominantly a focus on housing need, we note that there is also a need to consider Gypsy and Traveller accommodation and employment need also.	Comments noted. The District Council will continue to work with neighbouring authorities including Tamworth Borough Council through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield. The Local Plan Review will be informed by a range of evidence including Gypsy and Traveller Needs Assessment.
SIO230	Tamworth Borough Council	13	Whilst requiring certain developments to provide a proportion of serviced plots could help LDC meet the requirement arising from the custom and self-build register, it would not necessarily lead to additional housing being provided. Therefore it would be better to focus on the allocation of sites specifically for custom and self-build plots which could also be smaller sites than might otherwise be allocated within the Local Plan for housing.	Comments noted. This will be considered further as the Local Plan Review progresses and will be informed by a range of evidence.
SIO231	Tamworth Borough Council	15	Yes	Comment noted.
SIO232	Tamworth Borough Council	16	Consideration could be given to taking in a larger area as part of the update including other parts of the A38 and A5 corridors. We would be happy to work with LDC and other parties as necessary to update the evidence.	Comments noted. The appropriate geography for the Gypsy Traveller Needs Assessment will be considered further as the Local Plan Review progresses.
SIO233	Tamworth Borough Council	21	Yes. This is probably the most sustainable option, provided that the infrastructure impacts are mitigated.	Comments noted.
SIO234	Tamworth Borough Council	22	Whilst we appreciate that all options need to be assessed at this point, we have some concerns around highlighting Tamworth as a potential area for growth as Tamworth's current adopted Local Plan shows that Tamworth does not have enough available space to meet its own needs.	Comments noted.
SIO235	Tamworth Borough Council	23	Yes	Comments noted.
SIO236	Tamworth Borough Council	24	We would agree that Fazeley, Mile Oak and Bonehill are sustainable locations for development, however we would not consider them to be 'rural' as, for example, Fazeley is contiguous with Tamworth and feels like part of its urban area.	Comments noted. Fazeley, Mile Oak & Bonehill is a settlement with a designated village settlement boundary and is within Lichfield District.
SIO237	Tamworth Borough Council	25	See response to question 22.	Comments noted.
SIO238	Tamworth Borough Council	26	Fazeley, Mile Oak and Bonehill were identified in the jointly commissioned 2009 Tamworth growth and infrastructure study as locations with positive sustainable credentials and we note that LDC are allocating sites at Fazeley. There may be further opportunities for growth in these areas which can be explored. Similarly, given the proximity of Hopwas to Tamworth urban area, now and in the future after the completion of 800 homes at Dun stall Lane, this location should be subject to further study.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO239	Tamworth Borough Council	28	The proposed new development at Thorpe Constantine doesn't appear to be as sustainable location as the two other options highlighted by the strategic growth study due to the lack of public transport facilities. Whilst it is worth considering as an option, we would want to be sure any impacts on existing infrastructure were fully addressed, in particular in relation to identified highways capacities in the north of Tamworth. This would be especially important given that the proposed location is not near to the existing rail network and so Tamworth would appear to be the nearest rail stations.	Comments noted.
SIO240	Tamworth Borough Council	29	No.	Comment noted.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO241	Tamworth Borough Council	30	The proposed development at Thorpe Constantine would be close to the border with NWBC. The potential impacts on infrastructure could extend to North Warwickshire who are also considering development nearby. We would want to be sure that the cumulative impact of these developments, and others within Lichfield, are taken into account and consider that this is further justification for a joint infrastructure study between LDC, NWBC, TBC and the relevant county councils.	Comments noted. Lichfield District Council are seeking to undertake work relating to infrastructure jointly with Tamworth Borough Council and North Warwickshire Borough Council.
SIO242	Tamworth Borough Council	31	Yes.	Comments noted
SIO243	Tamworth Borough Council	33	We acknowledge that the existing plan makes provision for Tamworth's unmet employment need and would like to see this carried forward to the new plan.	Agreed subject to review of the evidence base
SIO244	Tamworth Borough Council	38	Yes. It would probably also be useful to include a 'how?' section which sets out who the delivery agents are and potential funding streams.	Comments noted. The project description jointly with the 'What' section will address 'how'. Delivery Leads and funding streams will be identified as they become apparent.
SIO245	Tamworth Borough Council	39	Yes.	Comments noted.
SIO246	Tamworth Borough Council	40	The 'Critical' and 'Essential' categories seem to be similar in that they both suggest that those items of infrastructure are required in order to make development acceptable. It would perhaps be clearer to combine those categories into one covering essential infrastructure and retain the 'important' category as it is.	Comments noted: Agree the assessment of identified categories will require the support of a robust assessment framework which will ensure that there is clarity surrounding categorisation.
SIO247	Tamworth Borough Council	41	Yes. To expand on it further, the proposed joint infrastructure study could form part of the evidence base that could lead to cross boundary IDP projects which would be delivered in partnership between the local authorities concerned.	Comments noted
SIO248	Tamworth Borough Council	42	Our Infrastructure Delivery Plan is in the process of being updated and the revised document could be used to influence the Lichfield IDP, particularly in relation to infrastructure projects which may be cross boundary (as mentioned under question 41) and also where developments close to the border may impact on infrastructure in neighbouring authority areas.	Comments noted
SIO249	Tamworth Borough Council	43	Yes. We welcome the reference to engagement in relation to cross border infrastructure and a coordinated planned response.	Comments noted: The District Council is committed to working in cooperation with neighbouring authorities to ensure appropriate infrastructure response.
SIO250	Brian Morris	1	If Local Plan Reviews were planned to cover a period over 15 years ahead instead of 15 years, it could prevent close and confusing repetition of one Local Plan Review always concluding and the next immediately commencing.	Comments noted
SIO251	Brian Morris	2	The evidence base needs to clearly distinguish between the needs of the LDC population and the contribution to be given to the needs of the Birmingham or Greater Birmingham populations. Without this separation, any confidence in needs analysis is undermined.	Lichfield District forms part of the Greater Birmingham and Black Country Housing Market Area. As part of the duty to cooperate the Council has committed to engaging with its neighbours to meet the needs within the HMA.
SIO252	Brian Morris	3	No. The Birmingham Strategic Locations Study (BSLS) has over 20 alternative supply sites identified and evaluated and none of those is cross-compared to the LDC proposed growth options. The collaboration approach needs to extend to the assessment and prioritisation of the alternative sites in other local authority areas. Otherwise, what are we comparing the LDC options against? They are presented inside an LDC bubble only, which reduces the credibility of the LDC proposals.	The Strategic Growth Study presents a series of options that can be tested. The Local Plan Review includes the options relevant to Lichfield District. However the Local Plan review is not confined to those options.
SIO253	Brian Morris	4	Yes. The policies in 1.2 should be revised to indicate where LDC housing growth would be acceptable and would prevent LDC having to react to external pressures every five years. Instead, LDC would be proactive.	Comments noted
SIO254	Brian Morris	5	Yes. Those policies applying to Neighbourhood Plans (NP). LDC growth proposals affecting an adopted NP need a separate impact analysis as part of the overall impact assessment. Otherwise, NP's are devalued from inception.	Comments noted, LDC will need to work the those areas that have made NPs where the Review will have an impact
SIO255	Brian Morris	7	Yes. As stated in Q2 and Q4 we need to see LDC needs as distinct from other authority needs and in advance of the five year, re reviews where the housing growth potential, however limited, is to be found in LDC and if available and justified, for external needs.	Lichfield District forms part of the Greater Birmingham and Black Country Housing Market Area. As part of the duty to cooperate the Council has committed to engaging with its neighbours to meet the needs within the HMA.
SIO256	Lesley Edgley	Whole Document	OUR young people require homes and OUR older people should be able to downsize. LDC population not Birmingham - protectionist view to decisions made, need to control are own areas agreement should be Lichfield's Choice not Birmingham's not Hearne's or Government. Supports a mix of both plans - expand where possible and perhaps and new settlement. New settlement requires full infrastructure not sticking plaster, road rail in place before development takes place. Need to learn from Wall Island mistakes. Concern relating to Hearne 2018 report. vague unspecific with unreadable maps not actual visited the areas. From a Shenstone perspective - analysis based on transport and green belt. In their analysis they say that any New Settlement will have a train station within 1KM that is not a new settlement but a complete obligation of the village. Has Hearne considered plans for the development of Shenstone Business Park. There is plenty of land between Lichfield and Shenstone available - but green belt - with good opportunities for a new retail link good parking good links to A5 and A38. No need for 10,000 to access this in one small country station. Local Knowledge to ensure plans work. LDC have knowledge of what has already been planned which must form part of a ongoing package.	The consultation document relates to Lichfield District Council's Local Plan on which it adopts but the NPPF requires authorities to assist in meeting the unmet needs arising in neighbouring areas where it is reasonable to do so having regard to the principles of sustainable development.
SIO257	Hannah Bevins (National Grid)	Whole Document	National Grid have no comments to make in response to this consultation. National Grid is happy to provide advice and comments in regard to our networks.	Comments noted.
SIO258	Brian Morris	8	No, you have not identified the exact need for new homes to satisfy LDC needs. The Review has not cross-compared the LDC options to others using the Greater Birmingham Housing Market Area Study. See above for what needs to be done.	There is no requirement for the Review to cross compare the approach of other LPAs. Notwithstanding this LDC actively engage in DTC discussions and where appropriate comment on other LPA plans
SIO259	Brian Morris	9	Agree with LDC vision as it underwrites a specific vision for key settlements. None of the key settlement visions includes excessive growth.	Comments noted

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO260	Brian Morris	10	Yes, support the LDC Strategic Objectives as not one of the 15 LDC Objectives supports the options for growth set out for an Urban Fringe Extension near Little Aston or a New Settlement at Shenstone.	Comments noted - however the vision nor strategic objectives as currently drafted does not restrict growth across the District.
SIO261	Mark Liell on behalf of Mr & Mrs John Kingslake	8	Yes, and pleased that Lichfield DC are seeking to address the strategic housing requirements and shortfalls.	Comments noted
SIO262	Brian Morris	11	Yes. Well-designed and managed higher densities in existing urban areas are used successfully elsewhere and reduce the need to put pressure on low-density housing supply in the Green Belt.	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO263	Mark Liell on behalf of Mr & Mrs John Kingslake	12	Lichfield should look to assist both Tamworth and the wider Birmingham area in meeting the unmet needs of 30,000 + homes, and the opportunity arises to do so on land to the west of Mile Oak and south of the A5 in the District of Lichfield	Comments noted. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield.
SIO264	Mark Liell on behalf of Mr & Mrs John Kingslake	21	Yes, as these present the most immediately sustainable solutions.	Comments noted.
SIO265	Mark Liell on behalf of Mr & Mrs John Kingslake	22	Yes, there exists an easily accessible and largely self-contained area on the south west outskirts of Tamworth (c EU4) – comprising up to 200 acres + of mainly farmland, situated immediately south of the A5 and to the west of Mile Oak and bounded by Sutton Road, Hints Road and Bourne Brook, in which to develop 1000 + dwellings, with associated education facilities, small scale retail and employment. The land is available, suitable and deliverable and is considered as more appropriate than the land situated between the A51 and the A5.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO266	Brian Morris	12	LDC should be much more transparent about contributions made to GBHMA each year to date, as a proportion of overall LDC supply and as identified above should be much more transparent about the current proposals. Without this key metric, ambiguity, uncertainty and low confidence in any new proposals will continue.	Comments noted.
SIO267	Claremont Planning Consultancy on behalf of Bromford	1	The proposed plan period is evidence based. It exceeds the time period of the adopted Birmingham development plan but reflects the time-scale assessed in the GL Hearn report. Any longer time period for the plan review would be inappropriate and unsound. The time period proposed is in accordance with the NPPF. To ensure the timely delivery of development sites, the Local Plan should provide for a strategic approach to housing delivery and Green Belt release that optimises development opportunities.	Comments noted.
SIO268	Claremont Planning Consultancy on behalf of Bromford	2	Support the intention to undertake a Green Belt review, this should be a full review of existing Green Belt boundaries that must not be limited to the areas of search identified through the GL Hearn report. The opportunity to present defensible and logical Green Belt boundaries to large settlements must be taken, specifically around Burntwood. The impact of development upon Special Areas of Conservation has rightly been recognised as an important matter that requires further evidence base assessment. The provision of mitigation must be included within the strategy. A critical aspect of housing delivery is affordable housing delivery and also providing housing suitable for an ageing population. Further analysis of affordable delivery is considered necessary. This is particularly relevant to some of the strategic options proposed that rely heavily upon the development of previously developed land and increasing density of development; both of which can heavily influence the delivery and proportion of affordable housing as well as the suitability of development layouts for 'age aware' accommodation. To ensure delivery of affordable housing is not prejudiced by market forces and viability; particularly when reliant upon large urban extension and new settlements that are limited by physical and social infrastructure provision costs, alternative delivery of affordable housing communities by developers such as Bromford should be recognised for their potential contribution. Identification of sites that have the potential to deliver such affordable developments should be undertaken and prioritised through the consideration of suitable locations as a means of addressing affordable housing needs and shortfalls in delivery that may be expected on larger strategic allocations.	Comments noted, consideration of a Green Belt Review will be undertaken Comments noted evidence on the SAC will be considered. HRA will need to be undertaken at each stage of the Plan Consideration to undertaking a HEDNA will be undertaken
SIO269	Claremont Planning Consultancy on behalf of Bromford	27	Support Option 3, this option will allow for the expansion of Burntwood through the Green Belt review process, and allocation of the land north of Chorley Road to deliver a form of housing development that would be able to address localised affordable housing need requirements. As demonstrated by the layout plan provided, development of this site would be able to provide a defensible Green Belt boundary that would respond to existing landscape features, as well as incorporate mitigation to address the relationship to the Gentleshaw Common nature reserve to the north. The Green Belt review and site selection process should adopt a policy-off approach. The promoted site has the potential to provide a sustainable, affordable development with close collaboration with the existing urban extent of Burntwood. This is demonstrated by the planning consents issued for the residential development of sites either side and adjacent to the promoted land.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO270	Claremont Planning Consultancy on behalf of Bromford	2	<p>A new Green Belt Review should be undertaken that critically assesses the strategic development options recommended through the GL Hearn report. The Green Belt review must re-examine previously discounted areas of search to ensure that smaller development opportunities are recognised. An example of this is the northern areas of Burntwood that were previously discounted. The opportunity to present defensible and logical Green Belt boundaries to large settlements must be taken, specifically around Burntwood.</p> <p>Although the outward expansion of Burntwood has previously identified to be constrained, these should not prohibit the reconsideration of areas around Burntwood. The promoted Chorley Road site should be considered as suitable for release from the green belt to accommodate a new residential expansion area to Burntwood that has the capacity to provide affordable housing. The benefits of affordable delivery and housing provision at the Chorley Road site should be considered to contribute to sufficient very special circumstances to justify the removal of the site from the Green Belt.</p> <p>The site is relatively small and the topography of the site is relatively gentle. The site is unconstrained with any designations which directly affect the site itself, however the site is within 300m of the Gentsleshaw Common SSSI and close to Cannock Chase SAC.</p> <p>Bromford is a developer with a social purpose whose objective is to deliver affordable housing options through shared equity and rental properties provided across development sites, some of which involve market homes but the predominate aim is to deliver affordable home solutions.</p>	Comments noted, consideration of a Green Belt Review will be undertaken
SIO271	Claremont Planning Consultancy on behalf of Bromford	4	<p>The significant amendment of the Policies identified should be prioritised, especially Core Policies 1 and 6 relating to the Spatial Strategy and scale of housing to be accommodated, whilst Policy Burntwood 1 – 4 must also be updated to provide for further growth at Burntwood to recognise its potential for expansion to the north through a Green Belt Review.</p>	Comments noted
SIO272	Claremont Planning Consultancy on behalf of Bromford	9	<p>The vision of the current Local Plan is considered to remain the most sustainable form of strategic vision. The current Settlement Hierarchy places Burntwood as a large centre accommodating approximately 9% of residential growth. The current Local Plan initially identified that Burntwood should allocate 13% of housing requirements, but failure to fully assess the potential for Green Belt release and environmental pressures has reduced this proportion across the District. The emerging Vision should re-prioritise the expansion of Burntwood and recognise the specific affordable housing need requirements of the town. Equally the vision must identify how such pressures will be addressed.</p> <p>A backlog of housing has already been recognised by the but the Plan does not advocate the necessary boost in housing provision required by central government. It is crucial that a range of housing allocations be proposed to address historic backlogs.</p> <p>The representations being made on the site at Chorley Road, Burntwood are on behalf of a developer that prioritises affordable housing delivery that is in substantial need in Burntwood. Bromford are in the position to contribute towards the affordable housing provision to the Council.</p> <p>The 2012 Strategic Housing Market Assessment demonstrates the significant need for affordable housing within the Housing Market Area. Burntwood was the area within the District with the highest affordable housing need. Burntwood is a high order settlement, and is an appropriate location for further growth.</p>	Comments noted, matters raised here will need to be considered in the context of settlement growth. This could impact the vision
SIO273	Claremont Planning Consultancy on behalf of Bromford	11	<p>Any density policy should have the ability to differentiate between the location characteristics of sites, specifically sustainable urban sites that have the ability to accommodate multi-level high density layouts, as well as peripheral locations with lower density expectations. Related to this is the requirement to take account of specific housing needs and market requirements, such as down-sizing pressures for the older population and the growing trend of smaller household sizes.</p> <p>As such, any density policy must incorporate a degree of flexibility that allows specific housing requirements and also site characteristics to be provided for. However, any density policy that allows the potential of development sites to be maximised is supported.</p>	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO274	Claremont Planning Consultancy on behalf of Bromford	12	<p>The NPPF requires authorities to assist in meeting the unmet needs arising in neighbouring areas where it is reasonable to do. Notably the adopted Local Plan has already addressed cross boundary housing pressures successfully in providing for housing pressures arising from Tamworth and Cannock.</p> <p>Although potential locations of development provision have been identified through the GL Hearn report, it is important that the Local Plan review proposes a strategy that reflects the settlement hierarchy and local needs as well, so delivering a comprehensive approach that does not prioritise cross-boundary needs above that of the existing local requirements. Claremont Planning advocates that the most logical approach would be to identify development opportunities on the periphery of existing larger settlements, such as Burntwood, as well as consider larger strategic development opportunities such as the potential for new settlements. A combination of delivery forms that are able to complement the approach of delivery at main settlements as well as new allocations should be incorporated.</p> <p>A full review of the Green Belt surrounding main settlements and on the edge of the Birmingham Conurbation within Lichfield is required to deliver any of the proposed options. The Green Belt review must re-examine previously discounted areas of search to ensure that smaller development opportunities are recognised and identified for Green Belt release. The opportunity to present defensible and logical Green Belt boundaries to large settlements must be taken, specifically around Burntwood.</p> <p>The promoted Chorley Road site should be considered as suitable for release from the green belt to accommodate a new residential expansion area to Burntwood that has the capacity to provide affordable housing. The benefits of affordable delivery and housing provision at the Chorley Road site should be considered to contribute to sufficient very special circumstances to justify the removal of the site from the Green Belt.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence including a Green Belt Review.
SIO275	Claremont Planning Consultancy on behalf of Bromford	11	<p>Any density policy should have the ability to differentiate between the location characteristics of sites, specifically sustainable urban sites that have the ability to accommodate multi-level high density layouts, as well as peripheral locations with lower density expectations. Related to this is the requirement to take account of specific housing needs and market requirements, such as down-sizing pressures for the older population and the growing trend of smaller household sizes.</p> <p>As such, any density policy must incorporate a degree of flexibility that allows specific housing requirements and also site characteristics to be provided for. However, any density policy that allows the potential of development sites to be maximised is supported.</p>	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO276	Claremont Planning Consultancy on behalf of Bromford	21	Support Option 1 as this option will allow for the expansion of Burntwood through the Green Belt review process, and allocation of the land north of Chorley Road to deliver housing to address localised affordable housing need requirements. As demonstrated by the layout plan enclosed, development of the Chorley Road site would be able to provide a defensible Green Belt boundary that would respond to existing landscape features and incorporate mitigation to address the relationship to the Gentshaw Common SSSI/Nature Reserve to the north.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO277	Claremont Planning Consultancy on behalf of Bromford	22	Support Option 2 as this option will allow for the expansion of Burntwood through the Green Belt review process, and allocation of the land north of Chorley Road to deliver housing to address localised affordable housing need requirements. As demonstrated by the layout plan enclosed, development of the Chorley Road site would be able to provide a defensible Green Belt boundary that would respond to existing landscape features and incorporate mitigation to address the relationship to the Gentshaw Common SSSI/Nature Reserve to the north.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO278	Claremont Planning Consultancy on behalf of Bromford	23	<p>Support Option 2 as this option will allow for the expansion of Burntwood through the Green Belt review process, and allocation of the land north of Chorley Road. As demonstrated by the layout plan enclosed, development of the Chorley Road site would be able to provide a defendable Green Belt boundary that would respond to existing landscape features, as well as incorporate mitigation to address the relationship to the Gentleshaw Common nature reserve to the north.</p> <p>A full review of the areas of Green Belt surrounding main settlements and on the edge of the Birmingham Conurbation within Lichfield is required to deliver any of the proposed options. The Green Belt review must re-examine previously discounted areas of search to ensure that smaller development opportunities are recognised and identified for Green Belt release. The opportunity to present defensible and logical Green Belt boundaries to large settlements must be taken, specifically around Burntwood.</p> <p>The promoted Chorley Road site should be considered as suitable for release from the green belt. The benefits of affordable delivery and housing provision at the Chorley Road site should be considered to contribute to sufficient very special circumstances to justify the removal of the site from the Green Belt.</p> <p>The 2012 Strategic Housing Market Assessment demonstrates the significant need for affordable housing within the Housing Market Area. Burntwood was the area within the District with the highest affordable housing need. Burntwood is a high order settlement, and is an appropriate location for further growth. The developments at Coney Lodge Farm and the former Boney Hay Concrete Works demonstrate that the location of the promoted site is suitable and appropriate to accommodate some further growth, whilst also taking into account constraints around the town. The site is relatively small and the topography of the site is relatively gentle. The site is unconstrained with any designations which directly affect the site itself, however the site is within 300m of the Gentleshaw Common SSSI and close to Cannock Chase SAC.</p> <p>Bromford is a developer with a social purpose whose objective is to deliver affordable housing options through shared equity and rental properties provided across development sites, some of which involve market homes but the predominate aim is to deliver affordable home solutions.</p>	<p>Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.</p>

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO279	Claremont Planning Consultancy on behalf of Bromford	10	<p>The vision of the current Local Plan is considered to remain the most sustainable form of strategic vision. The current Settlement Hierarchy places Burntwood as a large centre accommodating approximately 9% of residential growth. The current Local Plan initially identified that Burntwood should allocate 13% of housing requirements, but failure to fully assess the potential for Green Belt release and environmental pressures has reduced this proportion across the District. The emerging Vision should re-prioritise the expansion of Burntwood and recognise the specific affordable housing need requirements of the town. Equally the vision must identify how such pressures will be addressed.</p> <p>A backlog of housing has already been recognised by the but the Plan does not advocate the necessary boost in housing provision required by central government. It is crucial that a range of housing allocations be proposed to address historic backlogs.</p> <p>A full review of the areas of Green Belt surrounding main settlements and on the edge of the Birmingham Conurbation within Lichfield is required to deliver any of the proposed options. The Green Belt review must re-examine previously discounted areas of search to ensure that smaller development opportunities are recognised and identified for Green Belt release. The opportunity to present defensible and logical Green Belt boundaries to large settlements must be taken, specifically around Burntwood.</p> <p>The promoted Chorley Road site should be considered as suitable for release from the green belt. The benefits of affordable delivery and housing provision at the Chorley Road site should be considered to contribute to sufficient very special circumstances to justify the removal of the site from the Green Belt.</p> <p>The 2012 Strategic Housing Market Assessment demonstrates the significant need for affordable housing within the Housing Market Area. Burntwood was the area within the District with the highest affordable housing need. Burntwood is a high order settlement, and is an appropriate location for further growth. The developments at Coney Lodge Farm and the former Boney Hay Concrete Works demonstrate that the location of the promoted site is suitable and appropriate to accommodate some further growth, whilst also taking into account constraints around the town.</p> <p>The site is relatively small and the topography of the site is relatively gentle. The site is unconstrained with any designations which directly affect the site itself, however the site is within 300m of the Gentleshaw Common SSSI and close to Cannock Chase SAC. The site is relatively small and the topography of the site is relatively gentle. The site is unconstrained with any designations which directly affect the site itself, however the site is within 300m of the Gentleshaw Common SSSI and close to Cannock Chase SAC.</p> <p>Bromford is a developer with a social purpose whose objective is to deliver affordable housing options through shared equity and rental properties provided across development sites, some of which involve market homes but the predominate aim is to deliver affordable home solutions.</p>	Comments noted, matters raised here will need to be considered in the context of settlement growth. This could impact the vision
SIO280	Brian Thompson	Whole Document	<p>Opposes Residential Growth Option 4 for a new settlement in the Shenstone Parish area. Development would destroy the identity of Shenstone and the surrounding villages. This would adversely affect the character, natural and historic beauty of the immediate area and beyond.</p> <p>A new town in Shenstone would annihilate vast swathes of Green Belt. Green Belt restrictions were put in place to protect nature in all its forms and prevent settlements merging. The reasons why these restrictions were put in place have not changed but become more pertinent than ever.</p> <p>There is no guarantee that housing and employment will be co-located. Clearly the majority of inhabitants will need to commute and the road network already struggles with current traffic levels. Local railway station are small served within limited parking.</p> <p>It would be more beneficial to spread new developments evenly throughout the district using neighbourhood planning. This would provide residents with more choice of provision and an environment more in line with the District's vision.</p>	In conformity with the Revised NPPF, the Local Plan sets the overall strategy for the pattern ... of development within which non-strategic neighbourhood plans are made.
SIO281	William Green	Whole document	<p>Terrible idea to develop the old Woolworths car parl including B&M store. Barring all traffic from Market Square should be considered. Parking restrictions should be lifted on a Sunday. Old cinema should be sorted out and decent shops should be encouraged to come to Lichfield as we do not have the range that is seen in Tamworth.</p> <p>Do not build on greenfield sites and will adequate medical facilities be provided to cover the families who occupy the houses currently being built?</p>	Lichfield's share of the quantum of development required by national planning policy cannot be met wholly on non-greenfield land as the evidence in the Strategic Housing and Economic Land Availability Assessments shows. Medical facilities are included in the Infrastructure Delivery Plan appendix.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO282	C Thompson	Whole Document	<p>Opposes Residential Growth Option 4 for a new settlement in the Shenstone Parish area. Development would destroy the identity of Shenstone and the surrounding villages. This would adversely affect the character, natural and historic beauty of the immediate area and beyond.</p> <p>A new town in Shenstone would annihilate vast swathes of Green Belt. Green Belt restrictions were put in place to protect nature in all its forms and prevent settlements merging. The reasons why these restrictions were put in place have not changed but become more pertinent than ever.</p> <p>There is no guarantee that housing and employment will be co-located. Clearly the majority of inhabitants will need to commute and the road network already struggles with current traffic levels. Local railway station are small served within limited parking.</p> <p>It would be more beneficial to spread new developments evenly throughout the district using neighbourhood planning. This would provide residents with more choice of provision and an environment more in line with the District's vision.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO283	Mr & Mrs Neachell	Whole document	<p>Objects to proposed development on open space in Shenstone for a number of reasons; detrimental impact upon residential amenity of the village; loss of valuable open space and trees; loss of good quality agricultural land; loss of habitat for wildlife and detrimental impact on nature conservation; traffic generation and impact on highway safety; increase in litter and detrimental effect on listed buildings and the Shenstone conservation area.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO284	Gareth Blocksidge	Whole document	<p>Green Belt within the District should be valued highly, it should not be subject to over intensive development. If the proposals outlined in the LPR were to be adopted, the environmental damage and disruption caused by installation of the housing and infrastructure would have a damaging and lasting effect on the local area and community. Under these plans it is easy to foresee the loss of our nearby green spaces where families can enjoy the benefit of natural surroundings and clean air. Schools are already stretched.</p> <p>Seems rather an excessive focus on green belt land rather than redevelopment of existing brownfield sites which could be used in part fulfill the stated housing targets.</p>	In conformity with paragraphs 138 and 139 of the Revised NPPF, when drawing up or reviewing Green Belt boundaries for Lichfield, the need to promote sustainable patterns of development will be taken into account. The Council will consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. If it has been concluded that it is necessary to release Green Belt land for development, the Plan will give first consideration to land which has been previously-developed and/or is well-served by public transport. The Council will also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. National planning policy requires, paragraph 139, when defining Green Belt boundaries, the Plan should: a) ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development; b) not include land which it is unnecessary to keep permanently open; c) where necessary, 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; ... e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period. The Urban Capacity Assessment shows the land available to split brownfield and Green Belt development. The IDP assesses green and school, etc., infrastructure needs.
SIO285	Clare Eggington (CCDC)	1	<p>End date is supported as this aligns with the wider work ongoing across the GBHMA. However, it is not clear what the base date would be for the plan. Suggests that it should run from 2016 to enable it to be based on the most currently available projections to inform the work on the plan going forward.</p>	Comments noted, there will need to be a consideration of any agreements between the GBBCHMA over plan period start dates
SIO286	Clare Eggington (CCDC)	2	<p>The table at Appendix A is helpful, and similarly to LDC, CCDC is undertaking a review of its own evidence base and the suggested areas to update seem useful. References to cumulative impacts on air quality are welcomed, including the recognition of the potential issues in relation to Cannock Extension Canal SAC (which was referenced in the HRA for the North Warwickshire Local Plan with regard to the cumulative impacts of development along the A5 corridor). It is possible that there will be scope for joint working on some areas of the evidence base and the constructive ongoing dialogue between Lichfield District Council and Cannock Chase Council is appreciated.</p>	Comments noted
SIO287	Clare Eggington (CCDC)	3	<p>The issues identified are supported and the commitment to working constructively with partners to address the issues of the housing shortfall across the GBHMA is welcomed. Cannock Chase Council and Lichfield District Council have regular meetings under the Duty to Co-operate. In addition to the issues identified there will need to be continued ongoing dialogue between the two authorities on the redevelopment of Rugeley Power Station and on Gypsies, Travellers and Travelling showpeople needs. It is understood that there is little change in terms of the retail evidence base but this should be kept under review should circumstances change.</p>	Comments noted
SIO288	Clare Eggington (CCDC)	4	<p>Potentially yes, although it is hard to understand what the options are in terms of amending the policies per se. Further discussion on any cross boundary implications under the Duty to Co-operate would be welcomed on this matter.</p>	The purpose of this stage of consultation was not to provide this level of detail.
SIO289	Clare Eggington (CCDC)	12	<p>The comments on the uncertainty surrounding the standardised methodology are understood and similar issues are being faced by Cannock Chase Council while final confirmation from Government is awaited. Lichfield District Council's constructive and positive engagement relating to the ongoing work on the GBHMA housing shortfall is welcomed as is the recognition that an element of this will need to be delivered in Lichfield District.</p>	Comments noted. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield.
SIO290	Clare Eggington (CCDC)	17	<p>From recent discussions under the Duty to Co-operate it is understood that the most up to date evidence does not show any increase over and above the levels committed in the adopted Local Plan Strategy, and these are reflected in the Local Plan Allocations document. Provided that this is the case, this position is supported from the Local Plan review.</p>	Comments noted

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO291	Clare Eggington (CCDC)	21	<p>This needs to be looked at very carefully in terms of the capacity of the existing infrastructure capacity to absorb additional growth. It is noted that paragraph 8.10 makes specific reference to 'Land North of Rugeley' although the 'blob' on the corresponding map seems to be east of Rugeley. From a recent Duty to Co-operate meeting, LDC confirmed the 'blob' was placed to identify the settlement in general terms but not the potential location of growth aligned to that settlement. It also confirmed that reference to 'north of Rugeley' referenced the potential for development within its own (i.e. Lichfield District) boundaries and does not propose sites or locations beyond its own boundaries. Nonetheless, this would potentially have impacts on the infrastructure, character and setting of Rugeley, which is an historic settlement bound by several constraints including flood plain, AONB and Green Belt and therefore this option would potentially cause concern. There would need to be detailed cross boundary discussion between Lichfield, Cannock Chase and Stafford Borough on this matter before any conclusions can be drawn as it is not clear at this stage what the proposals or options are.</p> <p>Likewise there would need to be discussions in relation to growth options relating to Burntwood as these will have potential impacts on Cannock Chase District (especially Norton Canes) although it is noted that this falls within one of the areas of search for 'proportionate dispersal' identified within the GL Hearn Study therefore it is accepted that this area will need further investigation.</p>	Comments noted. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate.
SIO292	John Bass	26	blank	N/A
SIO293	Russell Capper	1	<p>There is a flaw in the consultation with respect to housing numbers, in that there isn't a definitive number of dwellings set out within the document that the Local Plan will need to deliver.</p> <p>Growth option 1 would not see much development within villages. However, this option could impact more widely on the parish as a site is being promoted on the edge of Blake Street / Little Aston. This is likely to form an urban extension of 5,000-6,000 new homes and would see loss of Green Belt and open countryside. The potential impact upon Shenstone could be strain on infrastructure and services depending upon how effective proposals to mitigate these develop. Option 2 is likely to see some development within or adjacent to Shenstone village ("modest growth" isn't clarified any further) and may well still see the urban extension at Blake Street / Little Aston come to fruition. Option 3 would see more pressure for development at the Key Rural Villages including Shenstone and could potentially see some larger housing sites come forward around the village. Option 4 could be immensely damaging to Shenstone parish. One of the options for a new settlement is 'around' Shenstone. This could see circa 10,000 dwellings, employment land and other services and facilities being developed around the village. There are two other potential new settlement locations being considered, but only the Shenstone option falls within the Green Belt.</p> <p>Without clear information of the number of houses that the Local Plan needs to deliver being set out, the overall development strategy is difficult to address.</p> <p>We think that there is insufficient information in the consultation document to argue the case for a new settlement being an option. If the requirement arising from the GBHMA is such that only a new settlement can address it, then Lichfield District should be focussing on locations outside of the Green Belt, which would not see villages being significantly affected by a new settlement.</p> <p>We think that one of the most important things is to preserve the nature of the villages in the parish, and wherever possible protect our countryside and Green Belt too. In the years to come it is becoming increasingly unlikely that we will be able to keep Shenstone exactly as it is without any further development. You may wish to consider what is the lesser of two evils, seeing some incremental development around the village (and possibly also losing some countryside and Green Belt on the edge of Little Aston / Blake Street), or seeing the Shenstone Parish area significantly impacted by a new settlement to meet the needs of Birmingham?</p> <p>We think that the existing Vision for Rural Areas within the adopted Lichfield District Local Plan Strategy 2015 remains relevant and should be retained.</p>	The purpose of the consultation is to get views on the housing numbers, with commentary and evidence provided to guide those views. New settlement comment noted. Rural areas comment noted.
SIO294	John Bass	3	Option for Growth 1 may not 'fulfil the purposes of Green Belt' if - and only if all the designated Green Belt land within the district is untouched. That land between Fazeley/Bonehill, Shenstone, Stonall and around Little Aston forms the physical separation between most of the settlements in the district and the northern suburbs of Birmingham i.e. it performs the primary function of the belt. In terms of Options for Growth 2 and 3, while many other issues need addressing, the retention of a very high percentage of the 'southern' area should be paramount. Otherwise, we may as well make the whole district part of Birmingham because there will be no obvious separation.	Comments noted, options appraisals will be addressed as the Plan progresses
SIO295	John Bass	28	It is obvious from the map which of the sites impinges on the Green Belt. There is an absolute need to maintain the southern area of Green Belt separating the Lichfield district from Birmingham.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO296	John Bass	5	Policy 6 South of Lichfield. I note that 'deliverability is not in line with anticipated timescales'. So how is it feasible to consider a further plan in this area until the existing plan has been realised and the effect of the new and quite large developments known? Therefore what is the relevance of making amendments unless the current plan has had some major issues discovered since the previous land allocation and development was approved?	Deliverability of sites within the adopted Plan will need to be considered through the Review process.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO297	John Bass	26	None. This is the 'ruin everything' option most likely to destroy the character of the entire district and unsustainable in terms of infrastructure, especially minimising car use for employment, retail etc.	Comments noted.
SIO298	John Bass	11	Yes - because in my experience developers always want to maximise the number of properties on the land for which they have permission to build. The proposed density is usually completely at odds with neighbouring density. If the council had a strong density policy in place, perhaps it would deter inappropriate applications and save the council and worried residents a lot of time.	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO299	John Bass	21	Yes - because it will utilise existing infrastructure including retail and transport links, as well as employment opportunities close at hand.	Comments noted.
SIO300	John Bass	24	No - see my comments on Q23	Comments noted.
SIO301	Clare Eggington (CCDC)	23	As the same locations with potential for cross boundary impacts are identified (i.e. Rugeley and Burntwood) the same comments apply as for Question 21	Comments noted. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate.
SIO302	Clare Eggington (CCDC)	31	No objections in principle but there will need to be ongoing dialogue under the Duty to Co-operate in terms of any cross boundary implications as the detail is established.	Comments noted.
SIO303	Steven Norman	5	Support the policies but do not see how they can be retained if new settlements are agreed in the rural area.	Comments noted, policy impacts on any rural allocations will be considered.
SIO304	Steven Norman	2	The comments on the Green Belt in the HMA and GBSLEP are sometimes contradictory and certainly unclear. The Green Belt around Burntwood in its current form should not be altered as it complies with current national guidance.	Comments noted, consideration of a Green Belt Review will be undertaken
SIO305	Steven Norman	6	Yes.	Comments noted
SIO306	Clare Eggington (CCDC)	43	Ongoing dialogue with infrastructure providers is essential, as is cross boundary working where there are strategic implications. Cannock Chase and Lichfield District Councils have a long history of working together and with partners on these issues and this work will need to continue as work on respective local plans progresses.	Comments noted: The District Council is committed to working in cooperation with neighbouring authorities to ensure appropriate infrastructure response.
SIO307	Steven Norman	8	Yes but wish to see real commitment to Burntwood's health needs (Issue 12) as the Burntwood Health and Wellbeing Centre is due to close next year.	Comments noted
SIO308	Steven Norman	11	Yes.	Comments noted
SIO309	Steven Norman	18	Yes.	Comment noted
SIO310	Denise Hilson	1	No.	Comments noted, however there is limited justification provided to assist with informing the next stage of the Plan
SIO311	Denise Hilson	2	Distinguish between the needs of LDC population and the contribution given to the needs of Birmingham or Greater Birmingham populations.	Lichfield District forms part of the Greater Birmingham and Black Country Housing Market Area. As part of the duty to co-operate the Council has committed to engaging with its neighbours to meet the needs within the HMA.
SIO312	Denise Hilson	3	No. Alternative supply sites identified and evaluated none cross-compared to the LDC proposed growth options. More time should be given to assess and prioritise alternative sites in other local areas.	Lichfield District forms part of the Greater Birmingham and Black Country Housing Market Area. As part of the duty to co-operate the Council has committed to engaging with its neighbours to meet the needs within the HMA.
SIO313	Denise Hilson	4	Yes. Policies in 1.2 should be revised to indicate housing growth by LDC	Comments noted
SIO314	Denise Hilson	5	blank	N/A
SIO315	Denise Hilson	6	No.	No explanation is provided to support the response.
SIO316	Denise Hilson	7	Yes. Growth potential should be identified in advance by LDC.	Comments noted
SIO317	Steven Norman	26	Not Thorpe Constantine.	Comments noted.
SIO318	Steven Norman	28	No.	Comments noted.
SIO319	Diane Clarke (Network Rail)	Whole document	<p>Network Rail supports residential development (and station parking) on the former MAFF depot site off Burton Road, Streethay.</p> <p>Transport Assessments should also take into account the impact upon footfall at railway stations. Developers are encouraged to consider including within Transport Assessments trip generation data at Railway Stations. Where proposals are likely to increase footfall at railway stations developer contributions should be considered (either via CIL, S106 or unilateral undertaking) to provide full funding for enhancements at stations as a result of increased numbers of customers.</p> <p>Sustainable drainage proposals should take into account the impacts upon adjacent railway infrastructure, i.e. proposals must not import a risk of flooding, pollution, soil slippage onto the existing operational railway. Sustainable drainage systems within the Local Plan area should be directed away from the railway and should not use soakaways within 30m of the railway boundary.</p> <p>Developments within the neighbourhood plan area should be accompanied by a TS/TA which includes consideration of the impact of proposals upon level crossings with mitigation implemented as required. We would encourage the Council to adopt specific policy wording to ensure that the impact of proposed new development (including cumulative impact) on the risk at existing level crossings is assessed by the developer(s), and suitable mitigation incorporated within the development proposals and fully funded by the developer(s).</p>	Comments noted. MAFF depot site is proposed for allocation through the Local Plan Allocations document.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO320	The Leavesley Group	2	<p>The Southern Staffordshire Districts Housing Needs Study and SHMA update was published in 2012 and therefore is out of date. New assessments are required utilising 2016 population and housing projection data as the baseline upon which future housing growth is identified.</p> <p>Lichfield lies within the Greater Birmingham and Black Country HMA and it will therefore have major strategic implications arising.</p> <p>It is important that a robust evidence base is utilised in relating to the Spatial Portrait 2.6 (page 12) regarding the ageing population profile of the District.</p> <p>The Council's Rural Settlement Sustainability Study should be updated.</p>	<p>Consideration to undertaking a HEDNA will be undertaken</p> <p>Consideration of updating the RSSS will be undertaken</p>
SIO321	Mrs R Sproston	Whole Document	<p>There are no buses running from Burntwood to Lichfield on a Sunday. There is no continual path from Burntwood to Lichfield and in parts you have to walk in the road. By 2020 there needs to be another bus company that operate 7 days a week.</p>	<p>Issues under the control of Staffordshire County Council.</p>
SIO322	The Leavesley Group	3	<p>The emerging Fradley Neighbourhood Plan sets out a strategy for delivering facilities through enhanced development close to existing communities.</p> <p>In relation to LG landholdings and planning application 18/00078/OUTMEI, there is a correlation with the policy FRANP14 in delivering appropriate facilities for the elderly conveniently located to serve the Parish. LG have engaged with the Neighbourhood Plan and have demonstrated the benefits of the proposal to the extent that the Parish Council have given strong support, which required through Plan Review for an appropriate re-assessment of the SDA to logically regularise the scale which can be seen on an attached plan.</p> <p>Fradley Parish Council has given formal support to outline planning application 18/00078/OUTMEI.</p> <p>The LPR process should embrace the locally generated defined aspirations for an enhanced development portfolio that brings demonstratable benefits in the form of much needed facilities predominantly based around the needs of the elderly.</p>	<p>The Fradley Neighbourhood Plan is an emerging plan at this point.</p>
SIO323	Edward Fox (South Staffordshire DC)	Whole Document	<p>Provide an interim response. Welcome the publication of the document as the first stage in the process of updating the Local Plan. Support the approach being adopted towards identifying potential development scenarios to contribute towards meeting the level of future housing requirements emerging from the wider HMA. This document represents a sound starting point to being the process of testing a range of potential development options and welcome the opportunity for continuing engagement as these options are refined in the future to produce a future development strategy and associated site allocation proposals.</p>	<p>Comments noted.</p>
SIO324	The Leavesley Group	8	<p>Chapter 2 'Spatial Portrait' highlights the main issues facing the District it does require fundamental re-assessment as it intersperses issues with objectives, majority of which do not identify means of being addressed.</p> <p>In particular, Spatial Portrait 2.6 reflects heavily on an ageing profile for the District and its ramifications but does not translate in to a defined Issue or subsequent objective. This then fails to meet a publicised Governmental objective of providing an increased bespoke housing offer for the elderly. Issue 2 as 'specialist housing' is too generic to be effective.</p>	<p>Noted a review of the objectives and there delivery will be undertaken</p>
SIO325	The Leavesley Group	10	<p>The SP6 'Meeting housing needs' should be amended and specifically worded to reflect our response to Question 2; there is a wider context than meeting the needs of residents of Lichfield, more appropriately those of the needs of the wider Birmingham and Black Country Housing Market area.</p>	<p>The Review does include reference to the GBHMA shortfall. However it is recognised that the Plan Review will need to deal with cross boundary issues</p>
SIO326	The Leavesley Group	12	<p>The LP consultation document identifies the matter of unmet need within the HMA, as mentioned under responses to Questions 2 and 10. It is suggested that Lichfield District needs to fully meet those apportioned requirements through additional development sites. LG contend that such a logical site is within the enhanced Fradley SDA promoted within this representation in that this makes best use of a sustainable location for growth.</p>	<p>The Review does include reference to the GBHMA shortfall. However it is recognised that the Plan Review will need to deal with cross boundary issues</p>
SIO327	The Leavesley Group	19	<p>It is promoted that the LP review should be wide-ranging over and above housing, employment and retail, and should include policies related to Governmental priorities including elderly accommodation, self and custom build, community infrastructure and facilities.</p>	<p>Comments noted.</p>

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO328	The Leavesley Group	23	<p>Residential Growth Option 2 - Town and Key Rural focussed</p> <p>This option in effect continues the Strategic Strategy set in the adopted 2015 Plan, allowing for limited development at some of the Key Rural settlements. Fradley has a different dimension which is already set by a level of committed development as a minimum in the form of the Strategic Development Allocation. This is accepted as an appropriate minimum option for delivering growth if this is a principle allowing further sites to come forward to increase housing supply.</p> <p>Fradley is one of the settlements suitable to retain its status as a key rural settlement particularly in relation to the Parish aspiration to enhance community infrastructure and facilities through broadening the range of housing offer.</p> <p>Distributing housing to Key rural settlements in a fair and proportionate manner would enhance their sustainable credentials, particularly in allowing Fradley to enhance its facilities and services. The Fradley Neighbourhood Plan clearly sets out the Parish requirements in its database and aspirational policies.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO329	The Leavesley Group	24	<p>Residential Growth Option 2 - Town and Key Rural focussed</p> <p>This option in effect continues the Strategic Strategy set in the adopted 2015 Plan, allowing for limited development at some of the Key Rural settlements. Fradley has a different dimension which is already set by a level of committed development as a minimum in the form of the Strategic Development Allocation. This is accepted as an appropriate minimum option for delivering growth if this is a principle allowing further sites to come forward to increase housing supply.</p> <p>Fradley is one of the settlements suitable to retain its status as a key rural settlement particularly in relation to the Parish aspiration to enhance community infrastructure and facilities through broadening the range of housing offer.</p> <p>Distributing housing to Key rural settlements in a fair and proportionate manner would enhance their sustainable credentials, particularly in allowing Fradley to enhance its facilities and services. The Fradley Neighbourhood Plan clearly sets out the Parish requirements in its database and aspirational policies.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO330	Roy Brookes	Whole Document	<ol style="list-style-type: none"> 1. Believes that the inclusion of Shenstone in the list of key rural villages focussed for development is an error on the part of the planning authority. Infrastructure will only allow for minimal if any development. 2. Future development will only increase the existing traffic congestion particularly in the region of the station. 3. Future development would lead to the loss of Green Belt land. 4. Shenstone is at risk of flooding and is struggling to cope with existing drainage and pumping demands which would be exacerbated by future development. 5. Development within the city centre and surrounding villages will only cope with organic growth. Long term growth is only achieved by new development outside the green belt with proper infrastructure. 	The Government's objective of significantly boosting the supply of homes in the Revised NPPF makes the policy for larger than local growth to which all areas of Lichfield should contribute supported by the Infrastructure Development Plan.
SIO331	The Leavesley Group	25	<p>Residential Growth Option 2 - Town and Key Rural focussed</p> <p>This option in effect continues the Strategic Strategy set in the adopted 2015 Plan, allowing for limited development at some of the Key Rural settlements. Fradley has a different dimension which is already set by a level of committed development as a minimum in the form of the Strategic Development Allocation. This is accepted as an appropriate minimum option for delivering growth if this is a principle allowing further sites to come forward to increase housing supply.</p> <p>Fradley is one of the settlements suitable to retain its status as a key rural settlement particularly in relation to the Parish aspiration to enhance community infrastructure and facilities through broadening the range of housing offer.</p> <p>Distributing housing to Key rural settlements in a fair and proportionate manner would enhance their sustainable credentials, particularly in allowing Fradley to enhance its facilities and services. The Fradley Neighbourhood Plan clearly sets out the Parish requirements in its database and aspirational policies.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO332	Margaret Jones (Edingale Parish Council)	Whole document	Edingale Parish Council has considered the consultation documents provided as part of the Local Plan Review and wishes to comment that it prefers development growth options 1 and 2. It does not feel that options 3 and 4 would be sustainable due to the current lack of infrastructure as they would be less sustainable. There are currently few facilities in village locations and no bus service in Edingale so further development in this area would not be favoured.	Comments noted.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO333	Margaret Jones (Wigginton & Hopwas Parish Council)	Whole document	<p>Parish Council supports Option 4 of the growth options put forward. Options 1, 2 and to some extent 3 would allow further growth adjacent to or within the parish of Wigginton & Hopwas, and this area already has insufficient infrastructure to cope with development already planned or commenced.</p> <p>Connectivity to employment areas is essential. Routes from the village to Tamworth and the roads in and around Hopwas are extremely congested at peak times. There is no capacity to widen the existing roads.</p> <p>The Parish Council prefers the options of new settlements at Fradley or to the South of the area, however not at Thorpe Constantine, which would feed more traffic onto the Comberford Road and the North of Tamworth.</p>	Comments noted.
SIO334	Roger Yarwood (National Federation of Gypsy Liaison Groups)	15	The policy should not place any general restriction on the areas where Traveller sites should be allocated or considered. Only site specific criteria should be included to direct provision to appropriate sites. Otherwise, adequate provision will not be made.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence including a Gypsy Traveller Needs Assessment.
SIO335	Roger Yarwood (National Federation of Gypsy Liaison Groups)	16	The GTAA should cover Tamworth and Lichfield as a minimum. It would be more robust if it covered all of Staffordshire.	Comments noted. The appropriate geography for the Gypsy Traveller Needs Assessment will be considered further as the Local Plan Review progresses.
SIO336	Howard Willis	Whole Document	<ol style="list-style-type: none"> 1. Vital that the green belt between Birmingham and Shenstone is maintained otherwise it will be subsumed into the urban sprawl 2. Any increase in the size of Shenstone would be difficult to accommodate as resources are already stretched. 3. Any significant increase in the Lynn Lane estate would make life intolerable for residents as heavy traffic passing through the village is already a considerable problem. 4. Any idea that Shenstone is in a position to offer useful public transport links for an enlarged settlement would be laughable. The bus service has been reduced and the train station car park is overflowing. 	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence including a Green Belt Review.
SIO337	Joe & Cilla Edwards	Whole document	<p>Objects to the inclusion of Shenstone as a possible new settlement in the consultation of the new Local Plan. It should be omitted on the basis that:</p> <ol style="list-style-type: none"> 1) It is the only new settlement option of three in the green belt 2) It is the only new settlement option breaching the safeguarding from encroachment policy 3) It is the only new settlement option breaching strategic separation policy 4) It is the only new settlement option breaching local separation policy <p>These designations are clear in the GBHMA work, but no reference in the LPR.</p> <p>In addition the credibility of the Birmingham Growth Study assertion that Shenstone would have 'good access to public transport' because it would be 1km from the nearest rail station to Birmingham must also be challenged based on the accuracy of the distance assumed and station capacity.</p> <p>Does not agree that Shenstone would be a good option for further employment opportunities. We already have an existing employment area with long term vacancy rates due to its unattractiveness of its location, space standards, building structure ages and the local infrastructure not being able to sustain any increase in HGV volumes. Site turnover and current occupants relocation intentions further substantiate this point.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence including a Green Belt Review.
SIO338	Louise Branch	Whole Document	<p>Shenstone has produced a Shenstone Neighbourhood Plan which runs until 2029 and there was no mention of Birmingham overspill during the preparation or the vote. LDC need to talk to us in 2029 when the plan expires.</p> <p>Is it the needs of LDC being met or the needs of Birmingham. The size of the development has massive implications for the services LDC has to provide.</p> <p>The proposed new settlement is on Green Belt. The Neighbourhood Plan identified building on brownfield sites which seems to be ignored. Green Belt land benefits peoples wellbeing and health.</p> <p>Wall Island will not cope with the additional usage.</p> <p>LDC are taking a reactive not proactive view with their Local Plan. There is no evidence to support the idea that a rural settlement in Shenstone has been properly scoped, surveyed and proven. It would be good to see some evidence.</p>	Neighbourhood Plan is prepared by the Parish Council and evidence publicity is its responsibility. The Revised NPPF requires the Local Plan to be reviewed at least once every five years.
SIO339	South Staffordshire Water (Clare Ford, CT Planning)	1	In respect of land at Shenstone Pumping Station (SHLAA reference:480) Plan period of 2020-2036 is appropriate.	Comments noted

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO340	South Staffordshire Water (Clare Ford, CT Planning)	2	In respect of land at Shenstone Pumping Station (SHLAA reference:480) Rural Settlement Sustainability study should be reviewed and revised to ensure the provision of services and facilities in the Districts Villages is up to date.	Comments noted, a review of the Rural Settlement Sustainability Study will be considered
SIO341	South Staffordshire Water (Clare Ford, CT Planning)	3	In respect of land at Shenstone Pumping Station (SHLAA reference:480) Yes the key strategic cross boundary issues have been identified	Comments noted
SIO342	South Staffordshire Water (Clare Ford, CT Planning)	4	In respect of land at Shenstone Pumping Station (SHLAA reference:480) Yes, policies should be amended where there have been changes in circumstances and additional policies should be incorporated to ensure full and proper compliance with the NPPF.	Comments noted
SIO343	South Staffordshire Water (Clare Ford, CT Planning)	11	In respect of land at Shenstone Pumping Station (SHLAA reference:480) No the Local Plan Review should not consider the inclusion of a density policy.	Comments noted
SIO344	South Staffordshire Water (Clare Ford, CT Planning)	12	In respect of land at Shenstone Pumping Station (SHLAA reference:480) Yes, LDC should assist in meeting the unmet needs of the GBHMA. The allocation should be fair and proportionate.	Comments noted.
SIO345	South Staffordshire Water (Clare Ford, CT Planning)	21	In respect of land at Shenstone Pumping Station (SHLAA reference:480) No, town focussed development is not an appropriate growth option for the District.	Comments noted.
SIO346	South Staffordshire Water (Clare Ford, CT Planning)	23	In respect of land at Shenstone Pumping Station (SHLAA reference:480). Yes, agree that focussing development around the existing towns and Key Rural Settlements is an appropriate option for growth for the District.	Comments noted.
SIO347	South Staffordshire Water (Clare Ford, CT Planning)	24	In respect of land at Shenstone Pumping Station (SHLAA reference:480). Agree with the identification of the 7 Key Villages including Shenstone.	Comment noted.
SIO348	South Staffordshire Water (Clare Ford, CT Planning)	25	In respect of land at Shenstone Pumping Station (SHLAA reference:480). Pursuing Growth Option 2 where new development would be located in the towns and Key Villages will clearly provide for new housing coming forward in the most sustainable settlements in the District. It would consolidate and continue the existing Spatial Strategy for a further 7 years. This growth option helps to support rural services and facilities. The Key Village of Shenstone is a highly sustainable settlement for new growth. The settlement is capable of accommodating new housing development. One such suitable site is Land at Shenstone Pumping Station. It is well located in terms of its scale and location to the existing pattern of development in Shenstone. Site can provide some 40 dwellings. South Staffordshire Water are committed to bringing this site forward for development within the next 5 years.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO349	Rentplus UK Ltd (Tetlow King)	2	Pleased the Council is to review the SHMA and Affordable Housing Viability assessment as they are now quite dated and will not reflect recent economic changes or changes to the NPPF. These should look to review the new affordable housing tenure definition as set out in the new NPPF as these differ from the previous SHMA. Rent to buy is right for many households as it addresses the primary barrier to home ownership - the lack of a mortgage deposit. The specific Rentplus model is not delivered at an intermediate rent, as set out in the draft NPPF definition, but addresses the main barrier to ownership through a combination of a secure affordable rented period (whichever is the lower of 80% of open market rent, including any service charge, or Local Housing Allowance), giving time to save, and a 10% gifted deposit to enable tenants to buy their own home in 5, 10, 15 or 20 years. This makes the tenure more accessible and affordable to working households.	Comments noted

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO350	Rentplus UK Ltd (Tetlow King)	4	Policy H2 will require updating to reflect the new definition of affordable housing as set out in the new NPPF expected for publication in July 2018; the Council will be monitoring this in any case, but for reference includes rent to buy within the new definition of Other affordable routes to home ownership. The policy itself will need to reflect those new tenures and how the delivery of this wider set of tenures can assist in meeting a greater number of households in need across the new Plan period. The glossary definition of Affordable Housing should also be updated to include the broad spectrum of tenures which is set out in the emerging NPPF.	Agreed that the revised NPPF will need to be considered through the Local Plan Review process
SIO351	Booth Trustees (Nigel Gough Associates)	1	The Plan will not be able to be adopted by 2020 as there is not enough time for various drafts and examinations. Our view that it wont be adopted until 2022 when there will be adopted until 2022 when there will only be 14 years left of the Plan period and therefore less than the requisite 15 years. Plan period should be 2020- 2040.	Comments noted, no evidence provided to explain why the Plan will be adopted later than the Council's proposed timescales.
SIO352	Booth Trustees (Nigel Gough Associates)	2	We would have thought it logical for a Green Belt Review to have been undertaken and properly analysed in order to ascertain where Green Belt releases can take place to meet un-met housing need in the District prior to progressing with the Local Plan Review. In addition, Lichfield and its neighbours will have to take on board housing overspill from the City of Birmingham in line with the other adjoining local authorities, particularly as the City of Birmingham have not yet settled the numbers for their Adopted Local Plan and are about to start the Review of that Local Plan which will obviously increase the substantial un-met housing need.	Comments noted, consideration of a Green Belt Review will be undertaken
SIO353	Booth Trustees (Nigel Gough Associates)	4	Yes.	Comments noted
SIO354	Booth Trustees (Nigel Gough Associates)	7	Yes. There should be a fundamental Review of the Spatial Housing Strategy for the District and particularly that part of the Strategy that deals with villages and village growth and most particularly that part that deals with the Strategy for the Hierarchy of Growth Villages in the District.	Comments noted, the approach to delivering growth will be considered as part of the Review
SIO355	Booth Trustees (Nigel Gough Associates)	8	There is no specific reference to consideration of housing for the elderly, particularly given the demographic increase and there is no specific reference to consideration of housing for first time buyers	Comments noted
SIO356	Booth Trustees (Nigel Gough Associates)	9	In terms of the Vision, there needs to be more clarity over the substantial need for market family housing, the substantial need for affordable housing and then the specialist housing for the elderly as well as the young.	Comments noted , this can be considered
SIO357	Booth Trustees (Nigel Gough Associates)	10	Yes.	Comments noted
SIO358	Booth Trustees (Nigel Gough Associates)	11	No. National Planning Guidance is sufficient. Future Growth- Housing (there should have been a question about this) There is no reasoned justification for the Adoption of a growth target of "approximately 12% of residential growth" to be allocated to Fradley. This is un-researched and unjustified. Fradley should have a higher growth target given its proximity to Lichfield and its sustainable location. The reduction in the requirement to 340 dwellings per annum (dpa) from the previously adopted housing target of 478 dpa is unacceptable. The target must be over 500 dpa even to keep pace with housing requirements for the District.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy and quantum for growth. This will be informed by a range of evidence.
SIO359	Booth Trustees (Nigel Gough Associates)	12	Lichfield District should accommodate provision to take up to 10,000 dwellings from the city of Birmingham overspill requirement identified in the Adopted City of Birmingham Local Plan. If it takes less than that number it will under-provide and the problem will only exacerbate at the next City of Birmingham Local Plan Review.	Comments noted. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield.
SIO360	Janette Horoin	22	Potential impact on historic assets. DC should protect potential impact on historic assets which may lie undented. Outlines a number of research documents which identify Knowle Hill and provides links to the studies which identify bronze age settlement.	Comments noted. The Local Plan Review will be supported by an extensive evidence base.
SIO361	Booth Trustees (Nigel Gough Associates)	13	Lichfield District should identify appropriate sites for this provision, providing that it undertakes as a District Council to promote those sites itself	Comments noted. This will be considered further as the Local Plan Review progresses and will be informed by a range of evidence.
SIO362	Kirsty Weller	1	15 years goes very quickly, so a longer period, even 20 years would give more of a break between consultations.	Comments noted
SIO363	Kirsty Weller	2	It would be helpful to understand the requirements in Lichfield district and as a separate figure what Birmingham need.	Comments noted
SIO364	Kirsty Weller	3	No. We need to be able to more clearly see what other options are outside of the Lichfield area.	Options outside of the District will be addressed by other Local Plans
SIO365	Kirsty Weller	8	Need to look in more detail at the needs of Lichfield District.	Assessment of Lichfield Districts needs will be undertaken
SIO366	Kirsty Weller	9	Yes, as none of the key settlement visions includes excessive growth.	Comments noted
SIO367	Booth Trustees (Nigel Gough Associates)	14	No.	Comment noted.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO368	Booth Trustees (Nigel Gough Associates)	18	No. Lichfield DC should concentrate on getting this Local Plan Review through its Adoption before undertaking any further DPDs, Action Areas or Development Briefs / SPDs given its under-provision of planning officers. If not, it will just delay formal Adoption of this Local Plan Review as we envisage.	Comments noted. The Council is committed to preparing the Local Plan Review and the most appropriate supporting documents and evidence base will be considered as the review progresses.
SIO369	Booth Trustees (Nigel Gough Associates)	19	Land within village boundaries that is not appropriately and reasonably used should be developed. This is particularly the case where land has been Allocated for employment for over 20 years, such as at Fradley, where there is absolutely no likelihood of development for this use but where a more appropriate land use, such as housing, would have substantial benefits and be sustainable.	Comments noted
SIO370	John Thompson	1	Yes	Comments noted
SIO371	John Thompson	2	Listed of actions generally supported, certain issues need greater emphasis priority. 1 Rapidly changing nature of retail activity vital evidence base in up to date, need to undertaken concurrently with the plan 2018-2019, critical for to have a realistic understanding of Lichfield City centre in terms of scale and type of retail requirements ,over the short, medium and long term. 2 Need for commercial office space and realistic assessment of delivery must be up to date and robust, bearing mind new work patterns in culding working from home. It is not agreed that no action is required against Retail Evidence Base, for the reasons given in this and proceeding paras. 3 Comprehensive study of the environmental capacity of the city - capability and capacity to absorb any additional development. Topography, landscape, and setting of the City , setting of special historic assets, (including Cathedral) including impact on Green Belt, open space and countryside, capacity of physical and social infrastructure elements, services to establish the situation. Due to the importance of the City in the District and sub region and its unique character and position, it requires to be considered in a single comprehensive study and not, as currently , in a more piecemeal manner within a much wider often District based studies. it is accepted these District wide studies would still continue to play in the Evidence Base.	Comments noted consideration of undertaking the following will be undertaken: - Retail - Office - Environmental capacity of the District
SIO372	John Thompson	3	It is difficult to suggest mechanisms to ensure a consistent and fair approach across all authorities involved, for instance in addressing the "unmet needs of the Housing Market", without an external arbitrator akin to an Inspector or EiP Panel with a remit to guide and deliver a "regional or sub-regional strategy or plan". The current approach is piecemeal, divisive, open to commissioning bodies to brief a consultant with a potential slant. At the very least under the system currently operating there needs to be a criteria based approach which is consistently applied across the full range of issues, e.g. green belt studies, sustainable location studies. All such work should follow the same methodology and use the same criteria, and these mechanisms should be open and transparent. This should be a basis of all work undertaken by all parties involved in issues of addressing cross- boundary matters.	Comments noted, LDC will continue to engage with the GBBCHMA to seek to ensure a consistent approach is applied
SIO373	Kirsty Weller	12	Be clear what housing is to assist GBHMA each year.	Comments noted
SIO374	John Thompson	4	Agrees that the policies listed in in table 1.2 require significant amendment or replacement. Suggest that the following are removed from table 1.3 and are significantly amended CP2 the policy should include support for locations such as new or expanded settlements , where completion of substantial development would create sustainable development. CP3, No additional text SC2. Inclusion of locational criteria to define where proposals for wind turbines and solar panels and other forms of renewable energy are acceptable. CP4. Clearly emphasis that that development can only gain approval and be implemented once the infrastructure deemed necessary is in place or fully committed programmed to be provided. NR2, Strengthened to ensure 5 explicit purpose of Green Belt are fully incorporated - Lichfield City To preserve the setting and special character of historic towns as well as to the other purposes. CP14, No additional text BE1, more weight to the protection and enhancement of heritage assets particularly in regard to Lichfield City. the current policy gives to much weight to the promotion of development at the expense of the special character, also reviewed to ensure it supports high quality development in an affective manner. Lichfield 6 Because no formal planning approvals have been issued for South Lichfield developments the following should be consider, the completion and opening of Lichfield Southern Bypass between Birmingham Road and Tamworth Riad as a pre-requisite before development in three south Lichfield developments is occupied. Employment Allocation at Cricket Lane should be redesigned as B1 office use, Leisure and hotel in place of current Plan proposal. Change will be more environmentally appropriate at an important entrance to the city.sit against the housing allocation and could attract high technology activities and start-ups spin off activites from Whittington DMS site. in addition to those listed above. there are a number of policies where no change is proposed but do need to be subject to amendment as follows BE2 This policy needs strengthening to ensure the special character of the heritage assets is safeguard and enhanced as our response to CP4 and BE1 Policy Lichfield 3 LC1 LC2 F1 A1 each of these will require review once the special strategy has been reviewed.	Comments noted, as the review progresses any changes in circumstances associated with the Plan will need to be addressed in the form of policy additions. The AMR will be used to assist in monitoring the delivery of sites and policies. This will aid the council in determining whether further policies require update, amending or deleting.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO375	John Thompson	5	With the removal of the nine policies listed above in our response to Question 4, the Civic Society agree the remainder of the policies listed in Table 1.3 require minor amendment.	Comments noted
SIO376	John Thompson	6	With the exception of Policy E1, the Society agree with the list. In relation to Policy E1, the Civic Society consider this requires significant amendment for the reasons given above in our response to Question 2, paragraphs 2 and 3.	Comments noted, policy E1 will be considered through the Review.
SIO377	Kirsty Weller	25	No. The Shenstone Area New Settlement should be omitted as it is: - (a) A village of significant beauty, with a lot of ancient and interesting history. The character of the village would be damaged by the proposed growth and the visitor numbers would no doubt decline. (b) The new settlement option would endanger the environment and destroy the homes for a significant amount of wildlife who live within the Green Belt. (c) The new settlement option would have a detrimental impact on the close knit and supportive community, as the growth would mean that Shenstone would be so large it would be difficult for the community to remain the same. Many in the village have had families here for generations and would be devastated by the significant change to the village with a new settlement option. (d) Shenstone is already very congested for such a small village so any new settlement would require significant infrastructure investment which would significantly alter the character of the village. Other established urban areas are more sustainable. Shenstone station could not support any significantly increased passenger volumes given parking issues. The road network around the village is also poor and could not support an increase in traffic. Greysbrooke school is already a popular school and could not support the levels of growth that would occur with a new settlement option. (e) The Green Belt surrounding Shenstone is exceptional farm land and once gone it could not be returned back to its former glory. With the move to Brexit, it may be more necessary than ever for the UK to produce its own food within the country. (f) The only new settlement option of three in the Green Belt; (g) Is the only new settlement option breaching the safeguarding from encroachment policy; (h) Is the only new settlement option breaching Strategic Separation policy (i) Is the only new settlement option breaching Local Separation policy. These are designations made clear in the GBHMA, there is no reference or impact assessment of these designations in the LDC review. The credibility of the Birmingham Growth Study assertion that a new settlement around Shenstone would have "good access to public transport" because it would be 1km (0.6 miles) from the nearest rail station to Birmingham, must also be challenged. The challenge must be made on the accuracy of the distance assumed and station capacity. The assertion is made as part of a Venn diagram in the Growth Study.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO378	John Thompson	7	A policy for protecting and extending the open space network, links and corridors within Lichfield City is needed	The Council will give these matters consideration as part of the review, in particular focusing on the requirements arising from the NPPF and NPPG.
SIO379	Booth Trustees (Nigel Gough Associates)	21	We have, for the last 20 years, promoted land in the Fradley settlement with an access and frontage to the A38 for housing from its Allocation of employment in line with the NPPF and present Government advice. It would be better to focus attention on under-used landholdings within settlements first of all	Comments noted.
SIO380	Kirsty Weller	35	Branston	Comment noted.
SIO381	Booth Trustees (Nigel Gough Associates)	24	Yes, particularly in the case of Fradley.	Comment noted.
SIO382	Booth Trustees (Nigel Gough Associates)	25	No.	Comment noted.
SIO383	Booth Trustees (Nigel Gough Associates)	31	There should have been a review to release existing allocated land in Fradley that has no hope of development for this use and which would be better utilised for housing.	The Housing and Economic Development Needs Assessment will be reviewed as part of the evidence for this Local Plan review, including Fradley as part of the overall picture.
SIO384	John Thompson	8	Yes but it is considered the priority ones within the list are: - No's 1,4,8 and 11	Comments noted

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO385	Rugeley Power Ltd (Savills)	Whole Document	<p>Proposals for redevelopment of the Power Station are not fixed but background work continues to prepare they way to bring the site forward.</p> <p>LDC must plan for its own needs and those arising from DTC. It is expected LDC will be require to make some accommodation for the overspill. It is important that housing provision is located where it is appropriate to both Lichfield and the needs of the Birmingham focused HMA, which will need convenient access to Birmingham as the workplace focus for that compent of housing supply.</p> <p>The focus of the Local Plan should be sustainable development, seeking to maximise previously developed sites. Where there are previously development sites, policy needs to be supportive of development and flexible to respond to the opportunities and constraints the site might have.</p> <p>Potential for new, innovative and market leading developments should be encouraged. The Local Plan should be flexible to not constrain innovation in the component of a development or configuration of development. New forms of construction including modular and smart constructions should be encouraged and the approach to considering community enhanced.</p> <p>There is a need for creative approach to policy to deal with cross boundary issues such as different rates of affordable housing, open space and s106 requirements. Differential rates and requirements together with different CIL charges could result in undesired consequences for how the site is planned and delivered. Consideration should be given to a specific policy for the Power Station, or more generally, to allow flexibility in the application of policy. This could extend to CIL by having policy that makes provision for how CIL is applied to cross border sites.</p> <p>Envisage the Power Station site is capable of being developed to create a leading sustainable new place. Seek a policy content that enables emerging ideas for new forms of development to be brought to fruition successfully.</p>	<p>Comments noted. As required by paragraph 117 of the Revised NPPF, master planning policy should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Agreed that design policy should be reviewed, to potentially include methods of construction. The former Rugeley Power Station has a jointly adopted Supplementary Planning Document- Rugeley Power Station Development Brief SPD- and a submitted policy Site R1 in the Lichfield District Council Local Plan Allocations (Focused Changes).</p>
SIO386	John Thompson	9	<p>Need for more emphasise on heritage assets this would benefit tourism. Need to remove the emphasis on Lichfield City and Burntwood Town as the main locations for future growth for the various reasons put forward in this response and to include reference to growth being focused in a new settlement beyond the Green Belt.</p>	<p>Comments noted, consideration of strategic growth could have a bearing on the vision</p> <p>LDC welcome continual engagement with Lichfield Civic Society</p>
SIO387	John Thompson	10	<p>Changes required</p> <p>1 Sustainable Communities - less emphasis on Lichfield City and Burntwood Town and more on a new settlement.</p> <p>8 Employment opportunities certain current employment areas should be retained Eastern Avenue as high sustainable serve local community reducing out commuting.</p> <p>10 Tourism tourist attraction would be enhanced if the heritage assets of the City was protected and improved more attractive and unique marketing opportunity.</p> <p>14 Built Environment - greater emphasis on heritage assets of Lichfield City Centre enhance its character and distinctiveness.</p> <p>15 High Quality Development - this aspiration should be reflected in all policies and decisions concerning development particular priority Lichfield city and its heritage assets.</p>	<p>Comments noted, these matter will need to be considered when any updates to the Strategic Policies are undertaken.</p> <p>NLDC welcome continual engagement with Lichfield Civic Society</p>
SIO388	Michael Davies (Savills)	Whole Document	<p>Promoting a Sustainable Urban Extension on land which falls within Lichfield District, immediately north of the Birmingham administrative boundary and in close proximity to Blake Street Station.</p> <p>The broad area focused on (excluding existing properties and Aston Wood Golf Course) is located to the north of Blake Street Station and broadly extends as far west as Chester Road, as far north as Wood Lane and Footherley Lane and as far east as Birmingham Road which can be seen on attached location plan.</p>	<p>Lichfield District Strategic Green Belt review recorded area as not a 'key' settlement in strategy, urban sprawl a vital issue.</p>
SIO389	John Thompson	11	<p>The Civic Society does not support inclusion of numerical density policies in the Local Plan. It is considered that in principle the density of each new development should evolve as a result of full consideration of the context and surroundings of any site and the nature of the development itself.</p>	<p>Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.</p>
SIO390	John Thompson	12	<p>Because of the scale of the housing in current plan and the Green Belt considered Lichfield could only play a limited part and only if the same criteria was used by all to distribute including Birmingham. Welcome stated in para 6.15 " a consistent evidence base in relation to Green Belt being advanced across the HMA". Appear Urban Extensions has being supported in principle as sustainable locations - locations in sub region would be adjacent to built up areas of Birmingham City due to proliferation of services and employment opportunities. In terms of Lichfield District after Local Plan Sites on the edge of the City there are no reasonable or realistic potential urban extension areas available which would compare to Birmingham in terms of sustainability. In Lichfield (own and Birmingham growth) sustainable way forward would be a new or extended settlement outside of the Green Belt even in the face of long term lead ins. This approach should replace the on-going approach of letting the largest settlement in the District continue to grown by adding another onion ring of development on the edge of the City - much of the last development was in sensitive Green Belt, it is timely to halt this approach.</p>	<p>Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence including a Green Belt Review.</p>

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO391	Michael Davies (Savills)	1	<p>In respect of land promoted north of Blake Street.</p> <p>Considers the plan period proposed by LDC (2020-2036) acceptable at this point in time. Note that LDC anticipate having a plan adopted by 2020. One note of caution is uncertainty surrounding the shortfall in the Greater Birmingham and Black Country HMAs, as it may take longer than 18 months to agree what Lichfield's requirements are and therefore this could place the ability to deliver an adopted plan by 2036 into question.</p> <p>If the plan period is to run until 2036 then this would tie in with the Greater Birmingham and Black Country HMA Strategic Growth Study (February 2018) which considers the HMA housing need, supply and shortfall to the same timeframe.</p>	Comments noted
SIO392	John Thompson	17	<p>Concerns that the retail and office space proposed in the City Centre is unrealistic and excessive for an area of very special quality balance this with para 6.32 sustaining and enhancing historic environment and heritage assets. Changing retail trends should be considered current figure will be out of date by the time the revised plan is adopted. more recent proposals are over optimistic suggest further work to ensure reclaim is achieved. office proposals excessive change in trends, in terms of past delivery of office floor space in the City Centre improbable that an annual rate of 1,000sqm - 14000sqm can be achieved. requirement should be reduced. Cricket land SDA site employment allocation should be a priority for office provision.</p>	Comments noted. This will be considered further as the Local Plan Review progresses.
SIO393	John Thompson	18	<p>support AAP including Lichfield City and Burntwood. Such document has potential contain detailed policies help balance development in amore effective manner than is currently achieved. Could contain specify conservation areas enhancement policies include transport access matter car parking pedestrian cycleway links improve working of current pedestainisation in City Centre.</p> <p>Any new settlement should also have a AAP to support development.</p>	Comments noted. This will be considered further as the Local Plan Review progresses
SIO394	Michael Davies (Savills)	3	<p>In respect of land promoted north of Blake Street.</p> <p>Considers that the key strategic cross boundary issues have been addressed. In relation to the Greater Birmingham and Black Country HMAs shortfall, before any HMA authorities emerging Local Plans are finalised, the housing requirement across the HMA should be agreed in a Memorandum of Understanding.</p> <p>At a strategic level it is clear that as a neighbour to two authorities (Tamworth and Birmingham) that will not be able to accommodate their own housing requirement, that Lichfield will have to accommodate some of their shortfall. Under the Duty to Cooperate it would be anticipate this being addressed comprehensively across both HMA areas to enable each LPA to be able to prepare a local plan.</p> <p>Consider that there will be an opportunity for the land being promoted north of Blake Street / East of Chester Road to provide a Sustainable Urban Extension to Birmingham and provide viable cross boundary support to Birmingham's housing shortfall.</p>	Comments noted
SIO395	John Thompson	19	<p>Policies for wind turbines and solar farms - explicit criteria and locations.</p>	Comments noted. The inclusion of new policies will be considered as the Local Plan Review progresses.
SIO396	John Thompson	21	<p>No not an appropriate strategy for Lichfield or Burntwood. Both over years taken continuous peripheral growth requiring removal of land from Green Belt- position ow further growth beyond that in the Local Plan would breach physical and topographical thresholds environment and infrastructure capacity. of the Opportunities and challenges listed there seems more disadvantages than benefits particularly in the case of Lichfield and Burntwood. real impact on green Belt and adverse effect on character and historic assets of the city if further development is focused on Lichfield. However may be possible to focus elsewhere under this options opportunities in map 8.1 - north east or south-west of Tamworth large and sustainable settlement with infrastructure and employment. Rugeley also opportunities. the most sustainable location for town focused development is in the areas adjoining Sutton Coldfield with Birmingham or Walsall Council area. This areas is close to the amenities of the conurbation is well served by various transport modes including rail and bus and has a wide range of employment opportunities near.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO397	Michael Davies (Savills)	9	<p>In respect of land promoted north of Blake Street.</p> <p>Consider that reference should be made to Lichfield District's position in the wider sub region / HMAs and what role the Council sees the District playing in supporting both the Birmingham and the Black Country HMAs growth. May include a vision for increased investment in public transport and other key infrastructure to support a growing community. The vision may also widen to consider the opportunities arising from key investment in HS2 and the Commonwealth Games in Birmingham.</p>	Comments noted, matters raised here will need to be considered in the context of settlement growth. This could impact the vision

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO398	Michael Davies (Savills)	10	<p>In respect of land promoted north of Blake Street.</p> <p>Considers that the strategic objectives set out in table 5.1 of the Scope, Issues and Options Plan fail to convey how the Plan seeks to deal comprehensively with the pressures arising from the Birmingham and Black Country HMAs. Strategic Priority 6 refers only to meeting the needs of residents in Lichfield District. Without clarity on the additional housing that Lichfield may have to provide to meet the Standardised Methodology for the Objectively Assessed Need ('OAN') and the shortfall in requirements arising from the wider HMAs, the objectives currently set cannot be considered to be appropriate.</p> <p>The scale of additional housing requirement (as yet undefined) will need to be supported by the 15 objectives identified being adopted to ensure the comprehensive plan can be delivered. Any major revision to the housing requirement for the District could have significant implications for the provision of the priorities listed below therefore without a clear understanding of the Council's housing need, the strategic priorities proposed cannot be confirmed as still being relevant: Sustainable communities, Rural communities, Climate change, Infrastructure, Sustainable transport, Meeting housing needs, Economic prosperity, Employment opportunities, Centres, Tourism, Healthy & safe lifestyles, Countryside character, Natural resources, Built environment, High quality development</p>	The Review does include reference to the GBHMA shortfall. However it is recognised that the Plan Review will need to deal with cross boundary issues
SIO399	John Thompson	23	No largely for the reasons given in question 21 The element of this option that has benefits is to ensure the key settlements have some development in order to safeguard facilities and services.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO400	John Thompson	24	Yes in principle these are appropriate for inclusion as key rural settlements, however if significant change is introduced to the Plan Strategy and hierarchy of settlements as for instance being sought by the Civic society it may well be necessary to vary this list.	Comments noted.
SIO401	Michael Davies (Savills)	12	<p>In respect of land promoted north of Blake Street.</p> <p>The Birmingham Development Plan (adopted January 2017) identified an unmet need of 37,900 dwellings for the period 2011-2031 which yet to be re-distributed across the HMA. Furthermore, the Greater Birmingham & Black Country HMA Strategic Growth Study (February 2018) identifies an updated housing need of 250,000- 310,000 dwellings between 2011-2036 for the HMA. This latest assessment also identifies the potential for approximately 22,000 dwellings of unmet housing need from the Black Country Authorities.</p> <p>We consider that Lichfield should continue to work with the other LPAs in both the Birmingham and Black Country HMA areas to determine the following:</p> <p>i) What the standardised methodology means for the whole of each HMA area in terms of housing need;</p> <p>ii) Which LPAs cannot meet their Full Objectively Assessed Housing Need (FOAN) and what level of housing shortfall needs to be met by the other LPAs in the respective HMA</p> <p>iii) Use a Memorandum of Understanding (MoU) to agree which LPAs will take the housing shortfall, how many houses each LPA will take and then agree on the spatial strategy for absorbing the housing shortfall.</p>	Comments noted. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield.
SIO402	John Thompson	25	No	Comment noted.
SIO403	Michael Davies (Savills)	21	<p>In respect of land promoted north of Blake Street.</p> <p>Supports Growth Option 1: Town Focused Development. As a minimum future growth should be directed to the settlements of Lichfield City and Burntwood as they are the most sustainable settlements in the District. This however should be balanced with development on the edge of existing urban areas such as Blake Street in Sutton Coldfield, as well as other smaller sustainable settlements. Sites adjacent to the existing urban area of Birmingham which are supported by existing services and public transport could provide a more sustainable option than a free standing settlement.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO404	John Thompson	26	Not considered acceptable or appropriate to accommodate all new development. It would spread development widely and thinly creating a particular unsustainable form of development and increasing car movements to an excessive degree. Environmental detrimental to significant sections of the District one of the least acceptable options put forward. There may be some scope for some villages to accommodate some affordable need.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO405	John Thompson	27	No	Comment noted.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO406	John Thompson	28	<p>Best long term strategic direction even though radical change to existing approach. Considerable benefits with simply continuing to follow previous policy. Relieve the very considerable development pressures, beyond the current Local Plan Allocation sites.. Opportunities to protect historic assets and special character of the Cathedral City, remove ongoing development pressures, release sensitive green belt land immediately adjoining the two main urban areas, over the medium long term it will provide the opportunity to make provision for housing needs and unmet Market Area needs.</p> <p>Will need a programme of infrastructural investment over a number of years, advantages of economies of scale compared to wide spread smaller infrastructure projects. If a AAP was prepared at an early date provide a framework and clear guidance to landowners developers and infrastructure providers enabling a comprehensive coordinated and plan approach. Approach would address challenges in Table 11.1 for achieving infrastructure provision.</p> <p>Challenge table 11.1 slow delivery rate - current plan has consistently failed to achieve delivery dates this criticism cannot be directed specifically to Option 4 . A fully planned and serviced New Settlement approached in a positive manner along the lines of New Town Development could achieve target of housing delivery.</p> <p>Of the three locations - don't support Shenstone whole are is green belt, few remaining sections between Lichfield and Birmingham. Thorpe Constantine option too isolated and removed form other settlements difficult to envisage the creation of a sustainable and viable settlement here with no even embryonic public transport facilities or network. Support Fradley Alrewas - beyond the green belt experience of recent successful development bus services already operating potential for reintroduction of rail services between burton and Lichfield and then cross city line. Report suggests constraints are not insurmountable - infrastructure provision is stated above. Mineral safeguarding and extraction can be addressed through a phasing programme</p> <p>Flooding can be avoided by sensitive locational planning and careful mitigation and design.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO407	Michael Davies (Savills)	23	<p>In respect of land promoted north of Blake Street.</p> <p>Consider that significant growth should be located around Lichfield City and Burntwood, but welcome the "potential other option "shown in Map 9.1, which indicates a potential development opportunity on the administrative boundary with Birmingham around Blake Street Station. Focussing (placing a major emphasis) on development around existing towns can only provide part of a comprehensive solution and will still require other major opportunities to come forward as part of a balanced housing portfolio.</p> <p>Consider that as part of the solution to support Birmingham's housing shortfall a significant opportunity on the urban edge of Birmingham's administrative area, north of Blake Street Station should be assessed. This is a location that was identified in the Joint Strategic Housing Needs Study, prepared by Peter Brett Associates.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO408	Michael Davies (Savills)	37	<p>In respect of land promoted north of Blake Street.</p> <p>Recognise that the main focus for new residential development is likely to be located within and adjacent to Lichfield and Burntwood as these settlements are the most sustainable within the District. However, as part of a balanced portfolio and where the significant housing shortfall from Birmingham is to be met under the Duty to Cooperate, then the opportunity presented north of Blake Street Station is considered to provide the Council with a viable and sustainable opportunity which could deliver between 1,000-6,000 dwellings.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO409	John Thompson	29	Variation to Fradley Alrewas would be to include Brookhay	Comment noted.
SIO410	John Thompson	30	Fradley recently development opportunity for critical mass to increase service provision improve sustainability.	Comment noted.
SIO411	John Thompson	31	They are significant in size offering range of opportunities well located approach supported. Any new settlement would need employment allocation to minimise commuting balance between those seeking work and available jobs.	Comments noted. Agreed, Table 11 on New Settlement Development identifies the need for mixed use development.
SIO412	Severn Trent Water	Whole Document	<p>Welcomes the opportunity to comment on the consultation. No specific comments to make but will provide detailed comments as the plan progresses.</p> <p>Provides general guidelines for information which include the company position statement, sewage strategy, surface water and sewer flooding, water quality, water supply and water efficiency.</p>	Comments noted.
SIO413	John Thompson	32	A number of existing employment areas should both continue and be expanded. Recent loss of Eastern Avenue. Each time an operational employment site is redeveloped results in increased number of residents needing to travel to further beyond the District. Employment land at Armitage Fazeley and Shenstone should be retained in that use and if possible expanded, land in Lichfield and Burntwood should be prioritised for employment use to reduce out commuting.	Comments noted. It is acknowledged that Lichfield does have a net outflow of workers (by nearly double at the last count in 2015).
SIO414	John Thompson	33	No	Comments noted.
SIO415	John Thompson	34	Support an additional employment area at Lynn Lane Shenstone but not the two other sites referred to. Seedy Mill is too isolated in appropriate neighbour for the Golf and Leisure complex and surround agricultural activities. Land at Bassets Pole is isolated from existing and planned housing growth not considered appropriate location.	Support noted.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO417	John Thompson	37	<p>The documents includes four extreme examples of development options. As stated early Question 28 support option 4 New settlement Development and would see this settlement take significant proportion of Districts growth but would expect this in conjunction with other settlements and locations including urban extension Rugeley Tamworth Birmingham and Walsall key villages smaller villages (local affordable need) and Lichfield and Burntwood. Settlement Hierarchy should be as follows.</p> <p>New Settlement (ALREWAS and Fradley urban Extension Rugeley Tamworth Birmingham and Walsall Rural Key Villages Armitage with Handsacre Fazeley Mile Oak and Bonehill Shenstone and Whittington Other Smaller Villages Lichfield City and Burntwood</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO418	Sport England (Rajvir Bahey)	2	<p>Sport England supports the authority's intention to review its Playing Pitch Strategy and Indoor Sports & Facilities Assessment, as set out in Appendix A of the consultation document, with the current documents being over 5 years old and therefore out of date.</p> <p>An updated evidence base, in line with Sport England guidance, will ensure that the Local Plan will be supported by robust and up to date assessment of need for open space, sports and recreations facilities and opportunities for new provision in accordance with NPPF paragraph 73. The two evidence base documents should reflect the location and scale of growth proposed within the Local Plan review and where necessary consider the impact of growth on the provision of sports and recreational facilities in neighbouring authorities.</p>	Comments noted consideration of undertaking Sport England related evidence base will be given
SIO419	The Crown Estate (Savills)	Whole Document	<p>Promotes three sites to the west of Lichfield City: Site 1 - Land off Abnalls Lane (SHLAA Reference 16) Site 2 - Land off Walsall Road North (SHLAA Reference 20) Site 3 - Land off Limburg Avenue (SHLAA Reference 21)</p>	Sites are outside the current settlement boundary, but adjacent to the sustainable settlement of Lichfield and close proximity to public transport routes, services and facilities. Within Green Belt. Do not wholly comply with current development plan policies in the Local Plan. However, sites fall within broad area for search for assessment of sites which could contribute to sustainable mixed communities. Loss of Grade 2 Agricultural Land may need justification. A Site of Biological Interest is within 1km and the impact on it may need further investigation. Sites are within the Cannock Chase zone of influence therefore mitigation may be required. In addition, site 16 falls within Forest of Mercia and contributions to this project may be required.
SIO420	Sport England (Rajvir Bahey)	4	<p>Appendix B highlights that Core Policy 10: Healthy and Safe Lifestyles should be significantly amended or replaced with consideration to be given to Sport England's and Public Health England's guidance on Active Design. It is considered that Active Design should be maintained in the Local Plan with it helping to contribute towards the Government's desire for the planning system to promote healthy communities through good urban design. The principles of Active Design aim to influence regeneration of urban space and the future approaches to planning which encourage active lifestyles, healthy ageing and healthy environments. This is particularly pertinent for the Authority to tackle the high rate of obesity levels as identified in paragraph 2.17 of the consultation document and to achieve the District vision to be fit and healthy; reduce the level of car use; and providing important green spaces and corridors to meet recreational and health needs. Sport England would welcome further discussions with the Authority regarding the role of Active Design and its implementation should there be any concerns raised about its implementation.</p>	Active design is an important tool for the plan making and decision making process. LDC will continue to work with Sport England in the development of the Review.
SIO421	Sport England (Rajvir Bahey)	5	<p>Support is given to the retention of Core Policy 11 subject to amendments being made to reflect the outcomes of an updated Playing Pitch Strategy and Indoor Sports & Facilities Assessment. Proposals for new facilities that are not consistent with the needs/priorities identified in the evidence base such as speculative proposals or proposals that would duplicate existing facilities or potentially compromise their sustainability would not therefore be supported in principle which is potentially how the policy could be interpreted in the absence of a robust evidence base. This approach would accord with the last sentence of paragraph 73 of the NPPF.</p> <p>In relation to HSC2 the amendments to the policy should reflect the updated Playing Pitch Strategy and Indoor Sports & Facilities Assessment. It should be noted that Sport England does not support the use of standards as the adequacy of playing pitch provision to meet the needs of pitch sports is a complex matter that a simple numerical standard cannot hope to capture. For example whilst the quantitative and accessibility standard might be met across the whole of the Authority there could still be an inadequate supply of playing pitches because;</p> <ul style="list-style-type: none"> - There is an imbalance of pitches across sports; - There is an imbalance of pitches across age groups; - Pitches are of poor quality and cannot accommodate the amount of play required - Pitches cannot be accessed because of the access or pricing policy of the site's owner / operator. <p>Instead developer requirements for playing pitches should be informed by an updated Playing Pitch Strategy utilising a Playing Pitch Calculator to ascertain the demand derived from new developments.</p>	LDC will continue to work with Sport England in the development of the Review.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO422	Sport England (Rajvir Bahey)	Whole document	Growth Options As highlighted above the updated Playing Pitch Strategy and Indoor Sports & Facilities Assessment should reflect the growth contained within the Plan and identify any cross boundary impacts. Where large scale settlements/urban extensions are proposed consideration should be had to undertaking joint strategies or assessments which will assist with the duty to co-operate requirements. It is also recommended that Active Design should be embedded into the housing allocations policies to ensure that the Vision for the authority can be achieved.	Sport evidence will be considered for Statements of Common Ground. It is considered that Core Policy 10 of the Local Plan Strategy covers active design appropriately.
SIO423	John Thompson	38	In a perfect world it may work effectively and the correct questions are generally being raised but experience indicates that the contents of an IDP showing infrastructure needs fail to be delivered in the final analysis with development proceeding without all the initially proposed infrastructure.	Comments noted: The delivery of infrastructure requirements is an ongoing activity, the District Council is committed to working with strategy providers, developers and other service providers to enable the sustainable development within the District.
SIO424	John Thompson	39	We consider it is important to prioritise infrastructure requirements but it will only matter if the delivery to satisfy this is achieved.	Comments noted: The District Council is committed to working with strategy providers, developers and other service providers to enable the sustainable development within the District.
SIO425	John Thompson	40	Yes but delivery must be achieved as stated above.	Comments noted: The District Council is committed to working with strategy providers, developers and other service providers to enable the sustainable development within the District.
SIO426	John Thompson	41	Additions Lichfield City - environmental capacity study including topographical, landscape, environmental impact, Green Belt, countryside, traffic and transport, historic asset, impact on historic assets of recent built development, take into consideration development the city is committed to. Transport studies include analysis and evaluation of all the larger option proposals i.e. New settlement, urban extension. Consider modes of transport in order to establish relative sustainability and viability.	Comments noted
SIO427	John Thompson	42	No	Comments noted
SIO428	John Thompson	43	You will put effort into the exercise to obtain a fairly complete list but we remain unconvinced as to the success of achieving their delivery in anything but a partial form. Due to many reasons largely out of planning authorities hands, including changing priorities or spending priorities by providers, initial or inadequate cost information. The plan needs a strong policy on infrastructure that is listed in the IDP to ensure approvals is only given to applications when there are legally binding commitments on implementation either prior to or in phase with the development.	Comments noted
SIO429	The Crown Estate (Savills)	1	Promotes three sites to the west of Lichfield City for residential development. Considers the plan period proposed is acceptable. Given the time it may take to agree Lichfield's housing requirements the end period 2036 should be reviewed should the prospects for having an adopted plan in place by 2020 become unlikely.	Comments noted
SIO430	Tom Beavin on behalf of Mr & Messrs Bliss & Argyle	1	The current two part Local Plan is not yet adopted. The Part 2 plan still has to be examined and adopted. This is unlikely before Mid 2019 at the earliest. The new Local Plan is unlikely to be adopted by December 2020. It would be sensible therefore to make the Plan period a 20 year plan period from 2020-2040. A Plan that has some longevity to achieve a degree of certainty over land allocations and green belt matters should be the aim. The current situation of running a Sites and Policies DPD and a new Local Plan at the same time is confusing to the general public and does not give confidence in the development plan system.	Comments noted, no evidence provided to explain why the Plan will be adopted later than the Council's proposed timescales.
SIO431	Mr & Mrs Wild	Whole document	Objects to the proposals made for Little Aston in the review on the grounds they are totally at odds with recently adopted Neighbourhood Plan. Local Plan Review appears to make redundant the Neighbourhood Plan. Whilst appreciating the need for additional housing, a major asset of Little Aston is its green belt semi-rural areas, which provide an essential division between Birmingham and Sutton Coldfield and the huge development planned by Lichfield to the south side of Shenstone. Proposed development would require significantly improved road systems and infrastructure, destroying the natural habitat of an area and have a massively detrimental effect on local wildlife. Country lanes of Little Aston are used extensively by walkers, runners, cyclists and horse riders and this leisure facility could be lost forever. Why always greenfield sites? Is this just to make it easier for the builders?	The current annual proportions of greenfield and brownfield land developed is almost exactly half and half, and former Green Belt is about 11% of land developed annually. Builders vary but some prefer previously developed land because infrastructure is already available and does not need provision.
SIO432	The Crown Estate (Savills)	2	Promotes three sites to the west of Lichfield City for residential development. It will be important for key evidence documents such as the SHMA to be available soon in order so they can be properly reviewed and taking into consideration. Green Belt Review - request land at Abnalls Lane (Site 1) is included in the Green Belt Review. Confirms clients land is not part of Beacon Park and therefore should be assessed in the Green Belt Review. The site does not play a significant Green Belt role and A51 Western Bypass to the west and Beacon's Park to the south form an appropriate defensible Green Belt boundary. Landscape Character Assessment - agree a review of the Landscape Character is required. Study is currently Staffordshire-wide study but think a more detailed Lichfield District study needs to be undertaken. In addition to the documents listed in Appendix A consider the National Forest background requires updating and the Urban Capacity Study should be updated.	Comments noted, consideration of a Green Belt Review will be undertaken Consideration to undertaking a HEDNA will be undertaken Consideration of a Landscape character assessment will be undertaken

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO433	Tom Beavin on behalf of Mr & Messrs Bliss & Argyle	2	The main evidence that will be required will relate to the housing and employment land requirements including the requirement to accommodate some of the needs of Birmingham. It will also require a careful analysis of the economic prospects of the district and how any growth should upwardly impact on the housing requirement. New evidence should be clear about how it has been derived and how additions to the base demographic information have been calculated.	Comments noted
SIO434	Tom Beavin on behalf of Mr & Messrs Bliss & Argyle	4	A new Plan will be required to review the Spatial Strategy and that will require a review of the current policies for Lichfield Burntwood and all the rural settlements. This will require a review of the green belt boundaries and changes to CP1 to reflect this along with the detailed consideration of individual green belt boundaries around settlements	Comments noted
SIO435	Tom Beavin on behalf of Mr & Messrs Bliss & Argyle	6	It is not agreed that the Policy North of Tamworth will require no change. The outcome of the Arkal Farm Inquiry is not available and this growth location is not yet certain. An adverse Appeal Decision will impact on this part of the Plan.	The Arkal Farm Inquiry resulted in outline permission being granted.
SIO436	Tom Beavin on behalf of Mr & Messrs Bliss & Argyle	whole document	So far in this Plan period the number of completions is not matching the overall requirements. This is largely due to the nature of the strategic allocations which take a long time to produce dwellings for the market due to long lead in times. A new plan should allocate a range of sites of varying sizes in various locations. A plan that again relies on very large strategic sites will simply exacerbate under delivery	Accepted on completion rate but this year has seen an excess. The Strategic Development Allocations provided nearly half of the supply.
SIO437	Tom Beavin on behalf of Mr & Messrs Bliss & Argyle	11	The revised methodology for calculating the housing needs in the Housing White paper of 2017 needs to be factored onto the baseline scenarios. The Strategic Growth Study applies very high density assumptions to new developments in order to reduce the overall quantum of land that is required. A new Plan should not be seduced by high density development, as this will be out of character in many locations. High density developments do not always result in an attractive living environment for family homes. The new Local Plan should consider densities appropriate for the Lichfield Area and not for the whole of the HMA. Lichfield District should assist in meeting the needs of the HMA in appropriate locations and which includes the sustainable settlements in the rural areas.	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO438	Tom Beavin on behalf of Mr & Messrs Bliss & Argyle	whole document	The Plan needs to include a review of the green belt to provide for new economic development and the expansion of existing sites. The current information in the ELAA fails to include for such sites	A Green Belt Review is proposed in the consultation document. Option 2 includes possible options located in the Green Belt. The inclusion of any site within the ELAA does not indicate that it will be allocated or successfully obtain planning permission for employment development.
SIO439	Tom Beavin on behalf of Mr & Messrs Bliss & Argyle	21	The locational options that are presented in the Greater Birmingham Growth study are untested. Large urban extensions have been shown to bring delivery problems and a delay in bringing land to the market. The Plan should define the most appropriate areas for growth based on the districts requirements and taking into account local circumstances and available land that is deliverable. The most appropriate growth option for Lichfield is one which includes making land available in the Key rural villages and some of the smaller sustainable villages to ensure the survival of village services and facilities. Land in Hopwas is available as shown on the attached Plan. Economic Growth and new employment should be distributed to assist in making employment land available in locations attractive to the market on a range of site sizes. It is not agreed that a Town focused strategy or a new Settlement strategy is appropriate for Lichfield. Experience has shown that land in the key villages and sustainable rural settlements is required to support and enhance the social facilities, and to deliver the range of housing including affordable homes that are required in the rural areas.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO440	Tom Beavin on behalf of Mr & Messrs Bliss & Argyle	whole document	The key settlements and other sustainable villages including Hopwas should be included within any growth option. There should be a tier of villages below the key settlements where new development is also acceptable on the basis of the sustainability of the settlement. This would enable a wider spread of development which would bring substantial benefits to the rural communities.	Option 3 offers opportunities below the key settlements tier subject to amendments to village settlement boundaries.
SIO441	Theatres Trust (Tom Clarke)	4	The document identifies that Core Policy 12 requires some minor amendment. We would concur; we welcome the inclusion of that policy within the existing plan but consider that it would benefit from strengthening by setting out robust evidence requirements and justification where the loss of a facility is proposed. We suggest this should include evidence of robust marketing effort over a period of at least twelve months at a sale or rental value appropriate to the facility's existing use and condition, and demonstration that the facility is no longer required by the community. This is to ensure that facilities are genuinely redundant and to limit scope for applicants to undermine facilities and manipulate viability.	Comments noted
SIO442	Theatres Trust (Tom Clarke)	10	We welcome Strategic Objective 11 (Healthy and Safe Lifestyles) which seeks to improve outdoor and indoor leisure and cultural facilities. The Trust has expertise in drafting policies relating to cultural and community facilities and would gladly assist the Council should it be required.	Comments noted - LDC welcome continual engagement with the Theatre Trust

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO443	Historic England (Christina Sinclair)	2	The reviewed Local Plan for Lichfield will be expected to include a proper description, identification and assessment of the historic environment and the supporting evidence base is expected to include robust heritage information. The Plan will need to demonstrate how it conserves and enhances the historic environment of the area and guide how the presumption in favour of sustainable development should be applied locally. This includes ensuring that the sites, which it is proposing to put forward for development, will assist in delivering such a strategy. In very broad terms, we advise that you carefully consider the following; • The Evidence Base: A sound local plan should be based on an up-to-date evidence which identifies heritage sites and their significance, the contribution the historic environment makes to the area, the issues and challenges is currently facing (or likely to be facing in the future) and the opportunities it offers for helping to deliver the other objectives of the Plan. I refer you to pages 2-3 of our Local Plan guidance (see link below) which includes a list of sources which develop upon those provided in Appendix A of your document.	Comments noted, historic environment evidence base will be considered
SIO444	Historic England (Christina Sinclair)	10	The reviewed Local Plan for Lichfield will be expected to include a proper description, identification and assessment of the historic environment and the supporting evidence base is expected to include robust heritage information. The Plan will need to demonstrate how it conserves and enhances the historic environment of the area and guide how the presumption in favour of sustainable development should be applied locally. This includes ensuring that the sites, which it is proposing to put forward for development, will assist in delivering such a strategy. In very broad terms, we advise that you carefully consider the following; • Spatial Plan Portrait: A robust description of the historic environment of the area, the contribution it makes and the issues facing it.	Comments noted - LDC welcome continual engagement with Historic England
SIO445	Historic England (Christina Sinclair)	7	Local Plan Policies: Both strategic and development management policies aimed at conserving or enhancing the significance of heritage assets. The relationship with other policy areas is important – consider what impact other policies could have on the historic environment, and also how the historic environment could contribute to other policy areas (e.g. its positive contribution to the economy and quality of life). You may find our webpages on ‘Heritage Counts’ helpful in considering the latter: https://historicengland.org.uk/research/heritage-counts/ .	Comments noted the Council will continue to work with Historic England during the Plan Review
SIO446	Historic England (Christina Sinclair)	3	The reviewed Local Plan for Lichfield will be expected to include a proper description, identification and assessment of the historic environment and the supporting evidence base is expected to include robust heritage information. The Plan will need to demonstrate how it conserves and enhances the historic environment of the area and guide how the presumption in favour of sustainable development should be applied locally. This includes ensuring that the sites, which it is proposing to put forward for development, will assist in delivering such a strategy. In very broad terms, we advise that you carefully consider the following; Strategic Cross-Boundary Issues affecting the historic environment: As both broad policies and specific site allocations (particularly with respect to setting) can have implications for heritage across local planning authority boundaries, account needs to be taken of heritage impacts in such cases in line with the Duty to Cooperate and strategic priorities.	Comments noted LDC will need to work with Historic England in drawing up the Local Plan Review
SIO447	Historic England (Christina Sinclair)	Whole document	The reviewed Local Plan for Lichfield will be expected to include a proper description, identification and assessment of the historic environment and the supporting evidence base is expected to include robust heritage information. The Plan will need to demonstrate how it conserves and enhances the historic environment of the area and guide how the presumption in favour of sustainable development should be applied locally. This includes ensuring that the sites, which it is proposing to put forward for development, will assist in delivering such a strategy. In very broad terms, we advise that you carefully consider the following; Site Allocations: ‘Great weight’ and ‘special regard’ need to be given to conserving designated heritage assets and their setting in planning decisions (I refer to paragraph 132, NPPF and the 1990 Act) and it is therefore highly important that these duties are reflected in the site allocations of the Local Plan. Non-designated heritage assets also carry weight under the NPPF and should be carefully considered. We strongly advise that a robust consideration of heritage impacts of site allocations is considered from an early stage. We advise this is undertaken in line with our advice document below (page 5 of the site allocations note provides a particularly useful methodology) and would encourage our engagement on specific site allocations as they develop. Historic England has produced a number of helpful guides which expand on the above, and we advise their content is followed in the development of the Local Plan Review and its associated work; • ‘The Historic Environment in Local Plans’: https://historicengland.org.uk/imagesbooks/publications/gpa1-historic-environment-local-plans/ • ‘The Historic Environment and Site Allocations in Local Plans’: https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/ • ‘Sustainability Appraisal and Strategic Environmental Assessment’: https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/	Comments noted. Proposed Reviews of the historic base are included in the consultation document.
SIO448	Historic England (Christina Sinclair)	9	The vision (page 25) We welcome the wording of the vision for the district, and would only comment that the wording in the final paragraph would merit some minor re-working for clarity as at present it suggests that the use of historic resources should be minimised which could be interpreted as at-odds with the positive desire to provide new uses for historic vacant historic buildings and make the most of heritage opportunities.	Comments noted - LDC welcome continual engagement with Historic England
SIO449	Historic England (Christina Sinclair)	10	While the content of strategic objective 14 is very welcome, we would advise a dedicated strategic objective for the historic environment.	Comments noted this can be considered

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO450	Historic England (Christina Sinclair)	Whole Document	We do not wish to comment at this stage regarding the Spatial Development Options for Growth. However, we would draw your attention to the central part that the historic environment plays in sustainable development and the purpose of the planning system (I refer in particular to paragraphs 7 & 17 of the NPPF) and the resultant need to give due weight to conserving or enhancing the historic environment in coming to a decision with respect to these options	Comments noted. Proposed Reviews of the historic base are included in the consultation document.
SIO451	Historic England (Christina Sinclair)	8	We note that good reference has been made to the contributions that the historic environment makes to the area (notably pages 19 & 23), which is very welcome. To help the plan review to be as effective as possible, and in line with paragraphs 126 & 157 of the NPPF, we would advise consideration of what threats are facing the historic environment and also what opportunities there are for proactive work either to address these threats or make the most of the opportunities local heritage poses (e.g. heritage led generation of an area). This could then feed into proactive and effective policies as the plan develops.	Comments noted - LDC welcome continual engagement with Historic England
SIO452	Historic England (Christina Sinclair)	6	As our advice with respect to policy review will be more helpful at draft stage when more information will be available, we defer detailed comment to the next stage of consultation (Preferred Options stage, at the latest). In the meanwhile, we refer to our previous advice including that given with respect to the Focussed Changes document, and our advice documents cited above	Comments noted, the Council will continue to work with Historic England during the development of the Review
SIO453	The Crown Estate (Savills)	3	Promotes three sites to the west of Lichfield City for residential development. Consider all the strategic cross boundary issues have been identified. However, in relation to the Greater Birmingham Housing Market Area ('HMA') cross boundary issue, we consider that before this Local Plan Review document is finalised, the standardised methodology and the distribution of the HMA shortfall must be agreed in a Memorandum of Understanding between the HMA authorities.	Comments noted
SIO454	The Crown Estate (Savills)	4	Promotes three sites to the west of Lichfield City for residential development. Agree with the policies listed in the table proposed to be significantly amended or replaced.	Comments noted
SIO455	Paul Gilmour	1	The plan period to 2036 is only appropriate if that is the basis for all the evidence. If using 2036 then the HMA housing needs assessment must use the more recent 2036 GL Hearn number as the starting point as the starting point not the BDP 2031 evidence of HMA housing needs.	Comments noted
SIO456	The Crown Estate (Savills)	5	Promotes three sites to the west of Lichfield City for residential development. Agree with the policies listed in the table proposed for minor amendment.	Comments noted
SIO457	Paul Gilmour	2	All evidence which does not align with the 2036 end date should be reviewed and updated. The options include a greenbelt site but there is no details of a green belt review. Given the strategic nature of the midlands green belt just comparing LDC green belt options in isolation is a pointless exercise. A greenbelt release in LDC immediately adjacent to Birmingham – without Birmingham undertaking a green belt review seems somewhat perverse given that it is in the main their need.	Comments noted
SIO458	Paul Gilmour	3	If a greenbelt review is required for LDC then one for Birmingham should be undertaken to ensure that the most sustainable and appropriate area of green belt is released not just one that is in the right Authority on paper. In reality the only sensible way to review the green belt in the midlands is for all the LPA's to do so at the same time on the same terms and using the same baselines. This is the only way to ensure sensible sustainable options are identified. In recognition of the GBSLEP's SEP aspirations for growth the housing targets for the HMA should reflect the higher economic targets. Given that the HMA report breaks down the residual housing shortfall into proportions to be taken by each LPA a clear undertaking to accept the report and the proportion identified would help people understand what the actual need was. In addition a commitment to accept some proportion of the Birmingham housing shortfall currently allocated to Tamworth and Cannock would also be useful. LDC should seek clarification as to timescales and delivery of HS2 phase 2 to provide certainty over its route and effect on the district.	Comments noted, LDC will continue to engage with the GBBCHMA to seek to ensure a consistent approach is applied
SIO459	The Crown Estate (Savills)	6	Promotes three sites to the west of Lichfield City for residential development. We agree with the policies listed in the table that require no change.	Comments noted
SIO460	Paul Gilmour	9	No as it does not adequately deal with the housing needs issues relating to the wider HMA.	The Review does include reference to the GBHMA shortfall.
SIO461	Paul Gilmour	10	No as they do not adequately address the HMA wide housing issues objective 6 should explicitly state a commitment to deal with the HMA wide housing issues.	The Review does include reference to the GBHMA shortfall. However it is recognised that the Plan Review will need to deal with cross boundary issues
SIO462	Paul Gilmour	11	Yes but only one that cleanly defines the considerations and requirements for higher densities – land owners and developers need to be able to accurately predict what will be acceptable on a site not have to guess.	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO463	Paul Gilmour	12	Yes By accepting the Higher level of predicted growth as the base line. By accepting the proportion of housing suggested as its share by GL Hearn By accepting a proportion of the housing aimed at the already constrained Cannock & Tamworth. By requiring Birmingham & the other authorities undertake meaningful Green belt reviews before any green belt release is considered. So as to ensure only the most suitable, sustainable and viable sites are allocated.	Comments noted.
SIO464	Paul Gilmour	13	Yes specific sites and or types of sites. Self build and custom build are well suited to small infill and expansion of rural village settlements and this is where they should be located.	Comments noted. This will be considered further as the Local Plan Review progresses and will be informed by a range of evidence.
SIO465	Paul Gilmour	19	Yes new settlements	Comments noted. New settlements are one of the proposed growth options set out within the consultation document.
SIO466	Paul Gilmour	21	Along with all other options yes – the authorities within the HMA must boost all housing delivery routes & site types/locations if they are to meet the identified housing need within the plan period. As detailed urban capacity cannot meet the OAN – new settlements must be considered	Comments noted.
SIO467	Paul Gilmour	23	Along with all other options yes – the authorities within the HMA must boost all housing delivery routes & site types/locations if they are to meet the identified housing need within the plan period. In addition if locations outside of LDC boundary are to be considered then a like for like level playing field must be constructed to ensure on the most sustainable, suitable and deliverable sites come forward. E.g. identifying BDP Area A as an option without considering area B is bad planning.	Comments noted.
SIO468	Paul Gilmour	24	Yes	Comments noted.
SIO469	Paul Gilmour	25	No	Comments noted.
SIO470	Paul Gilmour	26	Shenstone but only following green belt review (including other authorities green belt) and not to the extent suggested by GL Hearn it might support a couple of thousand units but not much more.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO471	The Crown Estate (Savills)	8	Promotes three sites to the west of Lichfield City for residential development. Consider that t further emphasis should be placed on Lichfield's role in accommodating some of the HMA's housing shortfall not just the District's housing need. Table 3.1 should be amended to include clear reference to the requirements of the wider HMA and what impact this has on the overall housing target for Lichfield.	The Review does include reference to the GBHMA shortfall.
SIO472	Paul Gilmour	28	No Shenstone is in the green belt and not capable of taking anything like that level of growth. No Thorpe Constantine appears to be a totally random location driven by its disassociation from Lichfield rather than any sustainability, deliverability or viability considerations. The area identified around Fradley has long been an area of growth and with development on the east of the A38 benefiting from a new station and improvement to the A38 this area should remain the centre for strategic and significant growth.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. The Strategic Growth Study is one piece of this evidence and provides a number of options for authorities to test, these are incorporated into the Scope, Issues & Options document.
SIO473	The Crown Estate (Savills)	9	Promotes three sites to the west of Lichfield City for residential development. We consider that reference should be made to Lichfield District's position in the wider sub region / HMA and what role the Council sees the District playing in supporting the HMA growth. This may include a vision for increased investment in public transport and other key infrastructure to support a growing community.	Comments noted, matters raised here will need to be considered in the context of settlement growth. This could impact the vision
SIO474	The Crown Estate (Savills)	10	Promotes three sites to the west of Lichfield City for residential development. Do not consider that the 15 strategic objectives sufficiently address the HMA housing shortfall. Before the strategic priorities are set, the scale of additional housing that the District will be required to provide to address the HMA housing shortfall will need to be agreed. If the housing requirement for the District significantly increases this will have implications on what the District's priorities will be to meet and manage the increase in housing growth.	The Review does include reference to the GBHMA shortfall. However it is recognised that the Plan Review will need to deal with cross boundary issues
SIO475	Coal Authority (Melanie Lindsley)	Whole document	Our records indicate that areas of Lichfield district have been subject to past coal mining activity which will have left a legacy; this includes 24 mine entries, and recorded and likely unrecorded coal mine workings at shallow depth. We note that this is an early stage in the Local Plan review process and that the consultation document sets out a series of questions to which responses are sought. I have reviewed the document and can confirm that we have no specific comments to make in respect of the questions asked at this current time.	Comments noted.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO476	The Crown Estate (Savills)	11	<p>Promotes three sites to the west of Lichfield City for residential development.</p> <p>Do not consider that it is appropriate to include a density policy in the Local Plan Review document. Each site has its own specific site constraints and opportunities, such as heritage or landscape constraints, therefore a blanket approach on density is considered to be too prescriptive. LDC should determine density on a site by site basis, taking into consideration site specific circumstances.</p>	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO477	The Crown Estate (Savills)	12	<p>Promotes three sites to the west of Lichfield City for residential development.</p> <p>Greater Greater clarity is required on what the Objectively Assessed Need / HMA shortfall distributions figures are before it can be established how the HMA needs can be best met. We envisage that LDC will be required to allocate additional land for residential development than the land that is currently allocated within the adopted Local Plan Strategy and the emerging Local Plan Allocations document. Sites should primarily be allocated within and adjacent to the main urban areas, such as Lichfield City, as these settlements offer the widest range of services, facilities and sustainable transport options. Green Belt should be reviewed around these settlements and consideration should be made to release Green Belt land subject to it being in a sustainable location. We also consider that future growth in Lichfield City should be directed to the areas which have not already been the subject of significant growth in the Local Plan Strategy and Local Plan Allocations documents to avoid existing infrastructure from becoming oversaturated. There has been limited growth on land to the west of Lichfield therefore we consider that future growth to meet the HMA housing need could be directed there.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO478	The Crown Estate (Savills)	21	<p>Supports the residential growth option focusing development around the existing main urban areas. The settlements of Lichfield City and Burntwood are the most sustainable settlements. Sites within and adjacent to these settlements should be prioritised. Consider land to the east of Lichfield as an area already subject growth in relation to East of Lichfield SDA. The southern part of Lichfield is subject to significant growth within the LPD therefore the LPR should direct development to the west of Lichfield. Residential Growth Option 1 is most preferred approach, followed by Growth Option 3, Growth Option 2 and then Growth Option 4 is least preferred.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO479	Burton Hospitals NHS Foundation Trust (Barton Willmore)	Whole document	<p>There is a robust position for removing the Hospital and the adjacent George Bryan Centre from the Green Belt. The Council recently considered and justified such a change during the Local Plan Allocations plan-making process, before revisiting its position.</p> <p>The Trust is currently undertaking an appraisal of its hospital facilities and services to inform a healthcare and investment strategy fund for the future, this is expected to be completed by 2019. This may include the disposal of property and land including the Sir Robert Peel Hospital in Fazeley. Additional funding could be secured via an element of residential development. This would help enable the delivery of additional hospital facilities on the site to improve its overall function and role within the community. The Trust is now the sole owner of the Hospital site and so capable of bringing forward development promptly.</p> <p>Green Belt Assessments: In March 2017 the Council published a LPA consultation document which removed the Hospital and the George Bryan Centre from the Green Belt and redrew the village settlement boundary to encompass it and adjoining land to the west, including a proposed housing land allocation 'Site FZ1 (Fazeley, Mile Oak & Bonehill 1): Land west of Sir Robert Peel Hospital, Lichfield Street, Mile Oak'. In January 2018 the Council published a Focused Changes document which both i) removed this housing land allocation and ii) depicted the Hospital and the George Bryan Centre within the Green Belt. The Trust made representations to the February 2018 consultation setting out why it considered these changes meant the LPA document was not positively prepared or justified. These representations drew attention to the conclusion in the Council's Local Plan Allocations Supplementary Green Belt Report 2016 (November 2016) that 'the site of the Sir Robert Peel Hospital should also be removed from the Green Belt as the site does not serve any of the five purposes of the Green Belt'.</p> <p>However, the simultaneous review of the Local Plan Strategy (2015) and the expectation that the District will need to accommodate some of the unmet housing need arising in the Greater Birmingham Housing Market Area is expected to re-open a review of Green Belt boundaries in any case. This should include the Green Belt boundaries at Fazeley.</p>	Comments noted.
SIO480	The Crown Estate (Savills)	22	<p>Promotes three sites to the west of Lichfield City for residential development.</p> <p>In relation to opportunities of this option, consider further emphasis should be placed on the range of services, facilities and sustainable transport modes that are provided within Burntwood and Lichfield which makes these two settlements the most sustainable settlements in the District. The other Residential Growth Options propose to direct growth to less sustainable settlements which is a key constraint.</p>	Comments noted.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO481	The Crown Estate (Savills)	23	<p>Promotes three sites to the west of Lichfield City for residential development.</p> <p>Consider that the majority of growth should be located around the settlements of Lichfield City and Burntwood. There are limited opportunities to develop land around existing town centres due to existing built development and site constraints. Therefore, in order to meet the District and HMA's housing requirement (when the distribution figures are agreed), new sites will be required on the edge of the urban areas. However, Residential Growth Option 2 will assist in preventing rural areas within the District from stagnating which has been noted as a challenge of Residential Growth Option 1.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO482	Stafford Borough Council (Alex Yendole)	whole document	<p>Confirms Stafford Borough is a neighbouring although but not within the GBHMA or GBSLEP.</p> <p>SBC is generally supportive of the vision and strategic objectives carrying on the broad approach to the current Local Plan. It would be useful to provide place - specific emphasis to provide more clarity.</p> <p>Important to ensure a balance approach takes place between the development requirements of neighbouring areas and the focus for new infrastructure, housing and employment growth within the District. Stafford Borough considers Residential Growth Option 2 and Employment Growth Option 1 are an appropriate strategy to ensure future sustainable development. It is recognised however that depending on the scale of growth a New Settlement may also need to be considered.</p> <p>SBC would welcome further details relating to 'Land North of Rugeley' as referenced in Residential Growth Option 1 and confirmation that this area is wholly contained within Lichfield District. SBC confirms it is not in a position to provide for any unmet gypsy, traveller & travelling show-people needs within Stafford Borough.</p>	Comments noted. Further details in future Statement of Common Ground.
SIO483	The Crown Estate (Savills)	26	<p>Promotes three sites to the west of Lichfield City for residential development.</p> <p>This is similar to Option 2. Consider that the majority of development should be directed to Lichfield City and Burntwood but smaller residential developments adjacent to existing rural settlements could also be acceptable in appropriate locations. Rural settlements offer limited services and facilities therefore they are less sustainable than Lichfield City and Burntwood therefore only limited growth should be directed to them. There is no preference to which rural settlements are suitable for further development, but note that these should be sustainable and provide access to some services or facilities.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO484	The Crown Estate (Savills)	28	<p>Promotes three sites to the west of Lichfield City for residential development.</p> <p>In order to meet the housing requirement and needs during the plan period, LDC should allocate a range of residential sites to deliver the District's housing target and ensure a rolling 5 year housing supply.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO485	Burton Hospitals NHS Foundation Trust (Barton Willmore)	2	<p>The Council's evidence base on Green Belt matters should be updated to reflect work underway for the Greater Birmingham Housing Market Area.</p> <p>The review should draw from the existing evidence base, including the Local Plan Allocations Supplementary Green Belt Report 2016, which previously justified a proposed housing land allocation at 'Site FZ1 (Fazeley, Mile Oak & Bonehill 1): Land west of Sir Robert Peel Hospital, Lichfield Street, Mile Oak', as well as the removal of the Hospital and George Bryan Centre land from the Green Belt.</p> <p>On this occasion, the Review should also consider the contribution the Hospital site may play in meeting additional housing needs alongside enhanced Hospital facilities, the provision of which is currently fettered by its designation within the Green Belt.</p>	Comments noted, consideration of a Green Belt Review will be undertaken
SIO486	Burton Hospitals NHS Foundation Trust (Barton Willmore)	4	<p>The following policies should be amended, albeit not in all cases significantly:</p> <ul style="list-style-type: none"> • Core Policy 1: The Spatial Strategy – This must be amended to reflect up to date objectives (e.g. housing targets) and to align with other policies (e.g. in identifying where alterations to the Green Belt are made). • Core Policy 10: Healthy & Safe Lifestyles - This should continue to support 'the development of new or improved facilities and initiatives which contribute to improve and accessible local health care'. The qualification 'where appropriate' should be removed from this statement. • Policies FAZ1-4 - Subject to the Fazeley, Mile Oak and Bonehill Key Rural Settlement being identified to accommodate additional housing growth, Policies FAZ1-4 will need to be amended to reflect this and to enable appropriate delivery. Policy FAZ2 should maintain support for improving, enhancing and delivery local facilities and amenities which contribute to improved health and healthcare. • Policy FZ1: Fazeley, Mile Oak & Bonehill Housing Land Allocations (Local Plan Allocations) – The current consultation does not anticipate amending policies from the (emerging) Local Plan Allocations document. However, it may self-evidently become necessary to amend this and other policies (and also the Policies Map), in order to identify locations for development to meet need and to reflect changed circumstances (e.g. altered Green Belt boundaries). 	Comments noted.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO487	The Crown Estate (Savills)	37	<p>Promotes three sites to the west of Lichfield City for residential development.</p> <p>Consider that a combination of all of the proposed Residential Growth Options may be appropriate. However, the main focus of residential growth should be within and adjacent to Lichfield City and Burntwood as these settlements are the most sustainable within the District. A range of sites should be allocated to address the housing needs of the local community and wider HMA</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO488	The Crown Estate (Savills)	38	<p>Promotes three sites to the west of Lichfield City for residential development.</p> <p>Reserves position on commenting on the IDP until the District's housing requirement has incorporated the HMA shortfall. Until this has been agreed the final housing requirement figure could have a significant impact on the IDP and the infrastructure that may need to be provided to support overall housing growth.</p>	Comments noted.
SIO489	The Crown Estate (Savills)	39	<p>Promotes three sites to the west of Lichfield City for residential development.</p> <p>Potentially supports the prioritisation of infrastructure as a useful tool but support is subject to how the infrastructure is prioritised and what is used to determine priorities. Until the level of housing growth proposed and the associated infrastructure is put forward reserves position on commenting on the Council's proposed strategy.</p>	Comments noted.
SIO490	Burton Hospitals NHS Foundation Trust (Barton Willmore)	23	<p>Yes. This option most closely mirrors the approach set out within the adopted Local Plan Strategy and ensures that development is directed towards existing built up areas, but in allowing for wider distribution (i.e. not solely focused on the larger towns) it offers better potential to meet a wider range of needs whilst placing less focused pressure on existing infrastructure. Support the Council's acknowledgement that there may need to be changes to the Green Belt boundary in taking this option forward.</p>	Comments noted.
SIO491	Burton Hospitals NHS Foundation Trust (Barton Willmore)	24	<p>We support the identification of Fazeley, Mile Oak and Bonehill as a Key Rural Settlement which would be considered to accommodate some of the unmet housing need under Residential Growth Option 2.</p>	Comments noted.
SIO492	Burton Hospitals NHS Foundation Trust (Barton Willmore)	25	<p>We consider Fazeley, Mile Oak and Bonehill suitable for further development. The Council (through the preparation of the Local Plan Allocations) previously proposed to allocate Site FZ1 – Land west of Sir Robert Peel Hospital, for residential. There is realistic potential to deliver additional residential development on part of the Hospital site, in line with the information provided to the Council on the Call for Sites form.</p>	Comment noted.
SIO493	Paul Mawer	Whole Document	<p>Objects to the Plan in the grounds that there should be no Green Belt development.</p>	Comments noted.
SIO494	Colin Low	Whole document	<p>Recognise need for housing but Shenstone Options not acceptable and do not focus adequately on some issues. Birmingham study fails to make full use of supply sites already identified Green Belt should be protected - pressures should be alleviated by better development of existing urban areas Shenstone's infrastructure is unsuitable for increased traffic current high volume of HGV. Alrewas/Fradley and Thorpe Constantine provide better locations for development.</p>	Comments noted.
SIO495	Louise Flowith	Whole document	<p>Policies should defend the Green Belt. Green Belt stretching from Little Aston to Shenstone strategically important provides essential division between Sutton Coalfield Birmingham and Lichfield also preventing urban sprawl. Development in these areas highly inappropriate damaging to the whole District. Prevention of urban Sprawl seen as one of the key purposes of Greenbelt. Government WP stated protection of Green Belt. Strongly object to green belt land being considered for development at this stage. G L Hearn report- identified several sites within Lichfield as being sustainable sites appropriate for development which importantly are not greenbelt. Therefore seems completely inappropriate for any greenbelt land to be even considered as appropriate for development before those sites have been brought forward. Proposals for Little Aston and Shenstone consider lack of infrastructure highway concerns impossible to consider how these areas would cope with massive influx of population transport and highway concerns are already major concern in these areas. Dismay regarding consultation process. Poor publicity ineffective result residents know nothing till last minute. Many local people are still not aware that the consultation has taken place. What happened was not successful and was insufficient in the future it is essential that more effective means area adopted.</p>	Comments noted.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO496	Tim Speed	Whole document	<p>Current proposals to current a new settlement of 10,000 homes is unsustainable and will change Lichfield character forever. Would result in 24% increase in population - not sustainable - loss of identity - Lichfield would become an extension to Birmingham similar to Sutton Coldfield and Solihull.</p> <p>Greenbelt fundamental character of Lichfield. Suggestion to re-designate the green belt to comply with a self-imposed duty to cooperate with neighbours is irresponsible. No justification for loss of greenbelt, future generation will live in an entirely in brownfield with a few national park. Duty to ensure development only happens on brownfield. Birmingham huge number of derelict factories adjacent to canal network - could be turned into amazing places to live. Excuse land is polluted and too expensive. Opportunity for Birmingham top clear up pollution - same as Brindley Place 20 years ago. Modal for canal network in Birmingham and should be fully developed before alternatives are considered. Dispute findings of Greater Birmingham report saying brownfield has been developed. Cycle from Lichfield to Birmingham along the SUSTANS cycle path all of these routes pass numerous derelict factories and wasteland should be redeveloped before alternatives.</p> <p>Reference to sustainable transport is nonsense, because there is a rail line, peak times full capacity no parking at Blake Street or Shenstone. Naive to suggest infrastructure is in place author may not have vested the stations - worst deception.</p> <p>Para 2.9 Lichfield is an attractive commuter area to Birmingham - this will change forever if the new settlement in Shenstone is taken forward.</p> <p>Para 2.25 large percentage of pop out commute - no reason why this will not continue with new residents increasing further traffic stain on roads.</p> <p>Para 2.42 Poor air quality consider consequence of an extra 10,000 homes - should get a report as evidence.</p> <p>Para 6.15 reference to all suitable brownfield land having been developed - duty to make sure this happens 100% sure before easier development takes place. (brownfield sites in Birmingham).</p> <p>At meeting at Shenstone Council keen to express need for Duty to Cooperate with neighbours - but also no not given in to a larger neighbour do to financial or otherwise pressures.</p> <p>New settlement will bring in more revenue for LDC should not be considered - otherwise no point of Greenbelt.</p> <p>Opportunity for LDC to lead the county firm commitment to retaining green belt and only allowing carbon neutral housing. Council should stand for sustainable development and protection of Green Belt.</p>	<p>There is no duty to Plan for brownfield only and national planning policy permits evidenced necessary greenfield development for growth to meet Government targets. Sustainable transport enhancement will be made in the Infrastructure Development Plan following Transport Assessments. Birmingham City Council is responsible for its own brownfield land and Local Plan. Local authorities are required to undertake tests to ensure that development will be viable before introducing optional standards such as carbon neutral housing.</p>
SIO497	Tim Speed	8	<p>Council should consider how to maintain unique characteristics of District fight to maintain greenbelt - District should be fiercely protective of.</p>	<p>Green Belt is given significant weight through national policy. This will be considered as part of the Review</p>
SIO498	Tim Speed	11	<p>Need to prioritise own constituents housing maintains current characteristics. Vital retain identity not just because of Birmingham. Council needs to assess Birmingham's neighbour's ability to meet the alleged housing shortfall on their brownfield sites. Gross dereliction of duty for LDC to consider new settlement without first checking other new settlement options including critically analysing the report that proposes a settlement in Shenstone - obtain own report.</p>	<p>Comments noted. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield.</p>
SIO499	Tim Speed	12	<p>Need to prioritise own constituents housing maintains current characteristics. Vital retain identity not just because of Birmingham. Council needs to assess Birmingham's neighbour's ability to meet the alleged housing shortfall on their brownfield sites. Gross dereliction of duty for LDC to consider new settlement without first checking other new settlement options including critically analysing the report that proposes a settlement in Shenstone - obtain own report.</p>	<p>Comments noted. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield.</p>
SIO500	Bovis Homes Ltd (Turleys)	Whole document	<p>Promoting a site to the north of Gillway Lane, Tamworth, site represents a sustainable and deliverable opportunity to deliver 300 market and affordable homes and public open space. Representation is supported by site map and vision document. The site extends to circa 12.8 hectares, it benefits from a wide variety of services and facilities in Tamworth and Wigginton including three primary schools, a secondary school, sports facilities, convenience stores and a Village Hall. Further facilities and services are available at Tamworth town centre approximately 1.6km to the south of the site. Tamworth train station is located 1.5km from the site. Site is wholly located within Flood Zone 1, there are no TPOs, listed buildings or scheduled monuments on site.</p> <p>Welcomes LDC's commitment to review the Local Plan in full. the LPR provides the mechanism to identify the appropriate contribution from Lichfield District towards the unmet needs across the GBHMA. The LPR has coincided with the Government's proposed updates to the national planning policy which requires local plan reviews at least every five years., therefore the LPR is timely as it enables LDC to adopt a Local Plan in late 2020 which is consistent with up to date national planning policy.</p>	<p>Support for the Review welcomed.</p>

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO501	Michael Webb	Whole document	<p>The Consultation Process: a lot of people who attended the public meeting were not aware of the consultation. The need for imaginative ideas to notify residents of the consultation such as flyers.</p> <p>The Local Plan: LDC should be giving BCC a hard time and further question what seems an easy cop out to ask for help from neighbours. The statement that they can't meet their needs to be seriously challenged. The number of brownfield sites in Birmingham is staggering and brownfield development should be prioritised. Lichfield still has a rural feel. Appreciate growth has to take place to keep Lichfield what it is but too much growth will change it. Can the infrastructure of Lichfield sustain wider wider? Isn't there supposed to be a barrier to prevent encroachment from one area to another?</p> <p>Shenstone: Shenstone is a small vibrant community and people pay a premium to live in rural village because it is rural and offers everything you want from living in a rural community. Won't development add to the issue of flooding? Parking at the railway station is already an issue. Many roads are narrow and adequate from 'normal' daily village life but not for rush hour, the village is used as a rat run to avoid traffic at Wall Island and Chester Road area up to Shire Oak. Residents of Shenstone have respected the need to permit development by agreeing in the neighbourhood plan for the site at the rear of the business park.</p>	Paragraph 65 of the Revised NPPF states; " 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... In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere." The Strategic Flood Risk Assessment will be reviewed as stated in the consultation document. This Review is part of the Development Plan to guide the future of the Neighbourhood Plan.
SIO502	Mark Shelly	Whole document	<p>Objects particularly to the allocation of 10,000 homes at Foottherley. Poor consultation short time period and lack of knowledge about documents in Shenstone. Haven't had chance to consider the documents in full. Major concerns over loss of Greenbelt including ecological issues and infrastructure provision. National Government Policy to protect green belt and keeping clean boundaries between settlements policy goes against this but also creates an unsustainable settlement. lose of greenbelt for Greater Birmingham have they considered all Green Belt land within their boundary before neighbouring authorities losing these. Loss of greenbelt impact on wildlife. Believe in brownfield before than green belt and if greenbelt need to be lost then it should be done in small pockets. Concerns over infrastructure services in and around Shenstone additional development would lead to safety issues - during rush hour lanes are used as cut through high traffic volume, dangerous speeding. Plus an increase in cyclists cause safety concerns. Proposals include some of Birmingham's housing requirements it is inevitable that there would be an increase in traffic along these lanes. Shenstone Train station providing a service to Birmingham - service is at capacity. Car park full overflowing by 7.45am. Concerns about emergency vehicle access. Charging for parking would increase parking on residential street. Double yellow lines push problem further away. Local schools are at capacity development of such size and scale unfeasible - should complete a study on education requirements. Opposed to plan development within Shenstone Parish, loss of greenbelt generally in Lichfield and also development of this size and scale in a singular location in the light of the infrastructure issues. Proposals should be reconsidered and options of other authorities neighbouring Birmingham should be fully considered before any decisions are made.</p>	Comments noted. The Strategic Housing Needs Study established the need. Greater Birmingham and Black Country Housing Market Area members to continue co-operation and prepare Statements of Common Ground.
SIO503	Bovis Homes Ltd (Turleys)	1	<p>In respect of land promoted north of Gillway Lane, Tamworth.</p> <p>Given that the Local Plan Review is programmed to be adopted in December 2020, the proposed period 2020-36 is considered sound.</p> <p>Considered appropriate for the Local Plan Review to have an end date of 2036 as it aligns with GL Hearn GBHMA Strategic Growth Study evidence and allows Lichfield District to deliver an appropriate contribution to the identified shortfall to 2036</p>	Comments noted.
SIO504	Bovis Homes Ltd (Turleys)	2	<p>In respect of land promoted north of Gillway Lane, Tamworth.</p> <p>A local housing need assessment will need to be undertaken as part of the Local Plan Review which should assess the District's housing need over the plan period, as well as the needs of the wider HMA, once the final details of the standard methodology have been confirmed. Site ref. 108 of the SHLAA refers to a large area of land north of Gillway Lane, approximately 52.37 hectares in size, including the land in Bovis' interest (12.8 hectares). The SHLAA does not reflect the individual sites that have been submitted for consideration through the emerging Local Plan Allocations document and as such the SHLAA should be updated. The updated SHLAA should consider Bovis' land north of Gillway Lane on a separate basis to the surrounding land, reflecting the evidence which demonstrates the land is suitable for residential development.</p> <p>Should the draft revised NPPF be published with the updated definition of deliverability, it will be necessary for Lichfield District Council to update the Urban Capacity Study given it includes sites which do not meet the updated definition.</p>	Consideration to undertaking a HEDNA will be undertaken

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO505	E.M.Owen	Whole document	<p>Green Belt Development breaches Safeguarding from encroachment and strategic and local separation. Forms Strategic gap between Sutton Coldfield/Little Aston and Shenstone must be protected, this section of green belt is most important, prevents coalescence, preserves setting and special character, stops encroachment, protects wildlife. Still hedgehogs in areas wild birds on protected list.</p> <p>Government White Paper - greenbelt should only be released in exceptional circumstances when all other reasonable options fully examined. Other large areas to the north and est of Lichfield which is not greenbelt suitable for suitable development.</p> <p>Concerns over infrastructure railway links parking facilities at Blake street and Shenstone, road, rat runs, Shops inadequate. Further why review so soon - pressure from Birmingham.</p> <p>Concern over consultation period.</p>	Consideration relating to evidence base- biodiversity. Green Belt comment noted.
SIO506	Bovis Homes Ltd (Turleys)	3	<p>In respect of land promoted north of Gillway Lane, Tamworth.</p> <p>Despite Tamworth's housing shortfall of 825 dwellings being small in scale and forming a localised issue, the Lichfield Local Plan Allocations document was submitted to the Planning Inspectorate with no additional commitment to addressing Tamworth's housing shortfall. Instead the Council has indicated it will deal with the shortfall as part of the emerging Local Plan Review.</p> <p>Lichfield sits within a sub HMA with Tamworth, along with North Warwickshire and Cannock Chase. Lichfield's adopted Local Plan Strategy recognises that land to the north of Tamworth is a sustainable location for accommodating Tamworth's shortfall. Lichfield should continue to allocate development to the north of Tamworth in order to meet the Borough's shortfall, including land north of Gillway Lane.</p> <p>The area north of Tamworth also received a positive outcome overall from the Sustainability Appraisal in support of the Strategic Growth Study, the area is within 10km of Birmingham City Centre, with a train journey time of approximately 20 minutes, providing suitable access to employment opportunities. Consequently, the Study identified the north of Tamworth as a recommended area of search for strategic development.</p>	It is incorrect to assert that Tamworth's housing need is localised. It in fact forms part of the GBBCHMA. However the cross boundary needs from all relevant LPAs will need to be considered as part of the Plan Review
SIO507	A.D.Owen	Whole document	<p>Green Belt Development breaches Safeguarding from encroachment and strategic and local separation. Forms Strategic gap between Sutton Coldfield/Little Aston and Shenstone must be protected, this section of green belt is most important, prevents coalescence, preserves setting and special character, stops encroachment, protects wildlife. Still hedgehogs in areas wild birds on protected list.</p> <p>Government White Paper - greenbelt should only be released in exceptional circumstances when all other reasonable options fully examined. Other large areas to the north and est of Lichfield which is not greenbelt suitable for suitable development.</p> <p>Concerns over infrastructure railway links parking facilities at Blake street and Shenstone, road, rat runs, Shops inadequate. Further why review so soon - pressure from Birmingham.</p> <p>Concern over consultation period.</p>	Comments noted.
SIO508	Bovis Homes Ltd (Turleys)	4	<p>Agree that policies listed in Table 1.2 will need to be significantly amended. In particular Core Policy 6 will need to be reviewed to reflect the District's housing need as well as an appropriate contribution to the HMA shortfall (to 2036), and the housing requirement will inform the distribution strategy and spatial strategy (Core Policy 1).</p>	Comments noted
SIO509	Robert Share	1	<p>If the Reviews appear to overlap in periods, without each being completed, there are confusing repetitions of aims and objectives. The current allocation plan runs to 2020 so why does this need to be overruled.</p>	The Council have committed to a Review of the Plan. As part of the Plan review there is a need to consider the currently adopted Plan Strategy.
SIO510	Bovis Homes Ltd (Turleys)	5	<p>In respect of land promoted north of Gillway Lane, Tamworth.</p> <p>Table 1.4 of the emerging Local Plan Review establishes that Policy 'North of Tamworth' does not require any change. This Policy should be reviewed and amended to ensure that the Local Plan Review meets the District's housing needs as well as contributing towards the significant shortfalls from Tamworth and the Greater Birmingham HMA to 2036 and delivers growth in the most sustainable locations.</p> <p>'North of Tamworth' has previously been considered as a suitable and sustainable location for development through the adopted Local Plan Strategy and as such this should be reflected within the Local Plan Review. The emerging Plan should seek to expand/ amend the broad development location 'North of Tamworth' and allocate suitable sites.</p>	The appropriate location of new housing will be considered through the Review process
SIO511	Cllr David Salter	Whole document	<p>Concurring general feeling of residents of Shenstone and surrounding areas and adjoining wards strength of feeling at the public consultation and support their submissions to you - expressing concerns about the impact of the suggested development particularly on behalf of Birmingham.</p> <p>Further what ever scale of cooperative development Lichfield consider now or in the future that as great a distance as possible is maintained between it and the boundary with Birmingham in order to prevent the loss of land and revenue when future Boundary Commission Reviews are made when at such time Birmingham would without doubt attempt and quite possible succeed to lay claim to what they would consider to be their property.</p>	Comments noted

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO512	Janet Coton	Whole document	<p>Agree there is a need for additional affordable housing but consider 10,000 houses in the Shenstone area would totally change the environment and just expand Birmingham. Not convinced moving out to green belt areas is the right answer, small developments are fine, scattered and being provided with a good infrastructure of efficient transport links. There is a need for schools, shops etc. considered in a sympathetic way to the area which already exists.</p> <p>The proposals for development swamp the area, changing its environment. From an environmental point of view I feel it is important to retain green spaces, the well being of residents also has to be considered.</p> <p>Not against development of small housing areas that are affordable, well designed with relevant infrastructure but strongly object to large housing areas that will ruin the area and not provide the right needs for residents.</p>	Comments noted.
SIO513	Bovis Homes Ltd (Turleys)	6	<p>In respect of land promoted north of Gillway Lane, Tamworth.</p> <p>Table 1.4 of the emerging Local Plan Review establishes that Policy 'North of Tamworth' does not require any change. This Policy should be reviewed and amended to ensure that the Local Plan Review meets the District's housing needs as well as contributing towards the significant shortfalls from Tamworth and the Greater Birmingham HMA to 2036 and delivers growth in the most sustainable locations.</p> <p>'North of Tamworth' has previously been considered as a suitable and sustainable location for development through the adopted Local Plan Strategy and as such this should be reflected within the Local Plan Review. The emerging Plan should seek to expand/ amend the broad development location 'North of Tamworth' and allocate suitable sites.</p>	The location of new growth will need to be considered during the Review
SIO514	Mr & Mrs Robinson	Whole document	<p>Accept more housing is required in the area and that Lichfield is responsible for planning.</p> <p>Option 1 This is our preferred option as new housing is based on existing built up areas on brownfield sites near to existing employment opportunities</p> <p>Option 2 We agree with this option but only if the settlement chosen have the resources to sustain the additional housing stock.</p> <p>Option 3 This is our third choice as the small settlements in our option would not have the relevant resources to accommodate the number of new dwellings required.</p> <p>Option 4 non option believe the green belt around Greater Birmingham should be sustained as urban sprawl to surrounding historical towns would be unthinkable. In the GBSG summary 2018 the Green Belt was described as :- To prevent neighbouring towns merging into one another to assist in safeguarding the countryside from encroachment to preserve the setting and special character of historic towns. To assist in urban regeneration by encouraging the recycling of derelict land and other urban land.</p>	Comments noted. The Historic Environment Landscape Character Assessment will be reviewed as per the consultation document.
SIO515	Bovis Homes Ltd (Turleys)	7	<p>In respect of land promoted north of Gillway Lane, Tamworth.</p> <p>Table 1.4 of the emerging Local Plan Review establishes that Policy 'North of Tamworth' does not require any change. This Policy should be reviewed and amended to ensure that the Local Plan Review meets the District's housing needs as well as contributing towards the significant shortfalls from Tamworth and the Greater Birmingham HMA to 2036 and delivers growth in the most sustainable locations.</p> <p>'North of Tamworth' has previously been considered as a suitable and sustainable location for development through the adopted Local Plan Strategy and as such this should be reflected within the Local Plan Review. The emerging Plan should seek to expand/ amend the broad development location 'North of Tamworth' and allocate suitable sites.</p>	Comments noted, the approach to delivering growth will be considered as part of the Review
SIO516	Richard Smith	Whole document	Suggest new plan 2020-2039 and start review 3 years ahead i.e. 2036 so that existing plan remains in place whilst the follow up 2039 - 2058 plan is being considered.	Comments noted.
SIO517	Bovis Homes Ltd (Turleys)	8	<p>In respect of land promoted north of Gillway Lane, Tamworth.</p> <p>Welcomes that the lack of affordable housing and the delivery of market and affordable homes to meet the District's needs are issues listed in table 3.1. However a significant issue which the Local Plan Review must deal with is ensuring that it delivers an appropriate proportion of the Greater Birmingham HMA housing shortfall to 2036, including meeting shortfall arising from Tamworth Borough. Contributing to this shortfall should be a key issue listed in the emerging Local Plan Review.</p> <p>These issues should be reflected in the District's strategic objectives set out at Table 5.1 also.</p>	The Review does include reference to the GBHMA shortfall.
SIO518	Bovis Homes Ltd (Turleys)	9	<p>In respect of land promoted north of Gillway Lane, Tamworth.</p> <p>The current vision seeks to sustainably locate development. This principle should underpin the vision for the Local Plan Review. The vision should also recognise the District's responsibility to accommodate an appropriate proportion of the Greater Birmingham HMA shortfall to 2036, particularly the shortfall arising from Tamworth.</p>	Comments noted, matters raised here will need to be considered in the context of settlement growth. This could impact the vision

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO519	Bovis Homes Ltd (Turleys)	10	<p>In respect of land promoted north of Gillway Lane, Tamworth.</p> <p>Welcomes that the lack of affordable housing and the delivery of market and affordable homes to meet the District's needs are issues listed in table 3.1. However a significant issue which the Local Plan Review must deal with is ensuring that it delivers an appropriate proportion of the Greater Birmingham HMA housing shortfall to 2036, including meeting shortfall arising from Tamworth Borough. Contributing to this shortfall should be a key issue listed in the emerging Local Plan Review.</p> <p>These issues should be reflected in the District's strategic objectives set out at Table 5.1 also.</p>	The Review does include reference to the GBHMA shortfall (which includes Tamworth's shortfall). However it is recognised that the Plan Review will need to deal with cross boundary issues
SIO520	Bovis Homes Ltd (Turleys)	11	<p>In respect of land promoted north of Gillway Lane, Tamworth.</p> <p>A density policy is not considered necessary. Whilst higher densities should be supported in suitable locations such as urban centres which benefit from accessibility to key services and public transport, a prescriptive policy covering the whole District is likely to compromise the delivery of housing developments that provide a mix of house types. This may lead to developments which are unattractive to house buyers and in turn affect the viability of development.</p> <p>If the Local Plan Review is to include a density policy, it should be specific to urban centres and public transport nodes.</p>	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO521	Jon Flowith	2	GB reviews should be strengthened to protect Sutton Coldfield and Little Aston this gap is strategic most important in Greater Birmingham HMA must be protected. Prevents unrestricted sprawl, prevents merging of towns assist in safeguarding countryside encroachment preserves the setting of the historic Little Aston and Shenstone both have conservation areas - all key functions of the Greenbelt. White Paper - greenbelt only amended in exceptional circumstances - LDC cannot do this whilst there are large sustainable development areas immediately to the north of Lichfield which are not Green Belt and which would significantly economically support the historic core of the City of Lichfield.	Comments noted, consideration of a Green Belt Review will be undertaken
SIO522	Jon Flowith	3	Better collaboration required - shouldn't repeat Arkall Farm	Comments noted
SIO523	Jon Flowith	4	Yes future Green Belt reviews should be strengthened to protect Sutton Coalfield and Little Aston New housing should be accommodated in sustainable locations outside Green Belt.	The appropriate location of new housing will be considered through the Review process
SIO524	Bovis Homes Ltd (Turleys)	12	<p>In respect of land promoted north of Gillway Lane, Tamworth.</p> <p>As an authority within the Greater Birmingham HMA, which shares an administrative boundary and a clear economic and functional relationship with Birmingham, the Black Country and Tamworth, Lichfield must recognise its responsibility to accommodate some of the HMA shortfall, which has been identified as a minimum of 60,855 dwellings up to 2036.</p> <p>In particular, Lichfield should meet the shortfall specifically arising from Tamworth. Land to the north of Tamworth, within Lichfield, has been identified as a sustainable location for meeting Tamworth's shortfall, as well as meeting Lichfield's own needs.</p> <p>Lichfield should look to agree a statement of common ground with Tamworth as soon as possible to confirm the proportion of the shortfall that it will accommodate. This should be done as soon as possible to ensure there are no delays to the Local Plan Review preparation process. If no agreement is reached, Lichfield should consider providing a proportionate contribution to the unmet need (arising from both Tamworth and the wider HMA) based on all available evidence at the point of submission. This was the approach recommended by the Inspector for the South Staffordshire Site Allocation Document Examination.</p>	Comments noted. The District Council will continue to work with neighbouring authorities including Tamworth through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield.
SIO525	Sam Lake (Turley) on behalf of Redrow Homes	1	The proposed period 2020-36 is considered sound. The plan period may need to be extended if there is a delay in the plan making process. There is another compelling reason which supports the proposed end date of 2036 which is the Greater Birmingham Housing Market Area (HMA) Strategic Growth Study which assessed needs between 2011 and 2036, linking with this allows consistent plan making with neighbouring authorities.	Comments noted
SIO526	B Boffy	Whole document	Birmingham City Council have multiple brownfield sites that should be used before encroaching on greenfield or green belt land. Shenstone has major problems with parking around the station and lorries and cars speed along the narrow roads. These problems will only be exacerbated by the development of large housing estates.	Birmingham City Council is responsible for its own brownfield land and Local Plan.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO527	Sam Lake (Turley) on behalf of Redrow Homes	2	<p>A local housing need assessment will need to be undertaken as part of the LPR which should assess the District's housing need over the plan period, as well as the needs of the wider HMA. These representations are supported by a Vision Document which demonstrates that the land to the south the Highfields Road is sustainable and deliverable. Green Belt will need to be released to meet LDC's housing requirement over the period 2020-2036. LDC's Green Belt Review (2016) assessed the land south of Highfields Road as the most appropriate for release from the Green Belt at Burntwood. Release of this site would not significantly compromise the strategic function of the Green Belt and this should be reflected in any review.</p> <p>The draft revised NPPF proposes a revised definition of "deliverability" which will need to be taken into account in future iterations of the SHLAA. Appendix A of the LPR consultation document does not refer to an update to the 2016 Urban Capacity Assessment but, if it is to be refreshed, it must assess the deliverability of specific sites against the proposed new NPPF definition (there are several sites within the 2016 UCA which are assessed as deliverable but which we contend do not satisfy the new definition).</p>	consideration to undertaking a HEDNA will be undertaken
SIO528	Jon Flowith	5	Yes at the very minimum - strengthen Green Belt new housing should be accommodated in sustainable locations.	Comments noted
SIO529	Jon Flowith	6	Yes. GB HMA study concludes that the strongest performing urban extension options in LDC area for more consideration is East of Lichfield between Watery Lane and the current East of Lichfield Miller scheme. Policies should be introduced to bring this forward.	The Strategic Growth Study provides a basis for the Authority to test potential options for allocating future growth
SIO530	Jon Flowith	7	Yes policies introduced to being forward urban extension option lying outside Green Belt and between Land at Watery lane and the current East of Lichfield Miller home scheme, provides economic support for historic core of Lichfield and protects the Green Belt. Additional economic support for housing is critical support day time and night time economies in particular retail. New policies to improve tourism offer should be introduced.	Comments noted, the location of new growth will need to be considered during the Review
SIO531	Sam Lake (Turley) on behalf of Redrow Homes	3	The principal strategic cross boundary issue is how LDC will make an appropriate contribution towards the HMA's unmet housing need. We welcome LDC's commitment to engage with neighbouring authorities to determine and deliver an appropriate contribution to the HMA shortfall, and our initial views on this matter are provided in the response to Question 12.	Comments noted
SIO532	Bovis Homes Ltd (Turleys)	20	<p>In respect of land promoted north of Gillway Lane, Tamworth.</p> <p>Given Lichfield's outstanding commitment to contribute towards Tamworth's unmet housing needs, it is recommended that the IDP is updated so that it considers how infrastructure could be improved in neighbouring authorities; to support development located either close to or across several administrative boundaries. For example, the land north of Gillway Lane, Tamworth, will benefit from road improvements at Gungate Junction (located in Tamworth Borough Council administrative boundary) and as such this infrastructure improvement should be included within Lichfield's IDP.</p>	Comment noted. The District Council is committed to working in cooperation with neighbouring authorities to ensure appropriate infrastructure response.
SIO533	Sam Lake (Turley) on behalf of Redrow Homes	4	Agree that the policies in Table 1.2 need to be significantly amended. In particular, Core Policy 6 will need to be reviewed to reflect the District's housing need as well as an appropriate contribution to the HMA shortfall (to 2036), and the housing requirement will inform the distribution strategy and spatial strategy (Core Policy 1). Land will need to be released from the Green Belt, including at Burntwood as the District's second largest settlement. This is considered further in our responses to Q21- Q30.	The appropriate location of new housing will be considered through the Review process
SIO534	Sam Lake (Turley) on behalf of Redrow Homes	8	Welcome that fact that lack of affordable housing and delivery of housing are key issues. Redrow have a strong track record of delivery and are committed to promoting the land south of Highfields Road through the emerging LPR and will be able to deliver housing at the site swiftly with the submission of an application for full planning permission if it were to be allocated for development. One of the most significant issues is identifying and delivering an appropriate contribution towards the Greater Birmingham housing shortfall. This should be made explicit in the list of key issues. The keys issues should also acknowledge that Green Belt will need to be released to meet housing requirements. These issues should also be reflected in the District's strategic objectives.	The Review does include reference to the GBHMA shortfall.
SIO535	Bovis Homes Ltd (Turleys)	21	<p>In respect of land promoted north of Gillway Lane, Tamworth.</p> <p>The most sustainable option will be to focus future growth within and adjoining the main urban areas, including to the north of Tamworth, as well as the larger and more sustainable rural communities. Directing development to these settlements, rather than a more dispersed approach (Option 3) or new settlements (Option 4) also provides the opportunity to deliver more comprehensive development including infrastructure improvements through new development. Furthermore, the lead in times associated with a new settlement (Option 4) would impact the District's five year housing land supply and its ability to deliver the housing requirement over the Plan period.</p> <p>Given that the north of Tamworth has previously been identified and allocated as a sustainable location for growth in the adopted Local Plan Strategy, it is recommended that the development potential for this area is maximised, acknowledging the suitability and sustainability of development sites in this area.</p> <p>The Strategic Growth Study (February 2018) also concluded the north of Tamworth be identified as a 'Recommended Area of Search for Strategic Development' and as such it is recommended that the Local Plan Review seeks to further appraise and maximise the suitability of this area for future growth.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO536	Jon Flowith	8	No housing policies should actively encourage specialist housing to cover self build plots for a range of small to large - encourage diverse housing, downsizing, extensions for families for grown rather than move, allow working from home, reduce commuting. Lichfield City Centre Polices provide holistic support for business which in turn support tourism. Policies for economic growth not jobs but better quality jobs in a high quality environment enables people to meet needs locally reducing transport journeys.	Self build requirements were posed as a question in the Review. Consideration of feedback will be given in developing the next stage.
SIO537	Jon Flowith	9	Vision is fine. None of the key settlements include excessive growth Lichfield City is the main settlement location with both City and Trent Valley stations. But current both policies do not holistically support City Centre.	Comments noted
SIO538	Jon Flowith	10	Yes. Strategic Objectives do not support and Urban Fringe Extension near Little Aston or a new settlement at Shenstone. But LDC must create policies that deliver in accordance with these high level objectives. Not clear how new settlement at Thorpe Constantine near to the M42 could be compliant with any of these Strategic priorities.	Comments noted - however the vision nor strategic objectives as currently drafted does not restrict growth across the District.
SIO539	Mr and Mrs Willets (Joanna Garland)	Whole Document	Promotes four parcels of land at Bassets Pole: Parcel A - Land at Slade Farm Parcel B - Land adjoining Slade Road and Turf Pits Lane Parcel C - Land adjoining the A453 and Shirrall Drive (North East) Parcel D - Land adjoining the A453 and Shirrall Drive (South West) Supports a review of the greenbelt with a view to considering allocating the land at Bassets Pole as development land.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO540	Sam Lake (Turley) on behalf of Redrow Homes	9	The current Vision seeks to sustainably locate development at key settlements. This principle should underpin the vision for the LPR. This will require the release of Green Belt land. The Vision should also acknowledge LDC's responsibility in contributing to the unmet housing needs of Birmingham.	The release of any Green Belt will need to be influenced by the Green Belt Review
SIO541	Jon Flowith	11	No Agree well designed high densities in existing urban areas and cities are successful elsewhere and reduced the need to put pressure on low density housing supply in Green Belt. Problem LDC is rural with 2 main centres. Must not fall into a trap of recreating high rise disasters of 1950 1960. Families deserve homes with gardens and decent size rooms.	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO542	Jon Flowith	12	See question 11 and LDC should accept the recommendation of the Strategic Growth Study that and Urban Extension described as East of Lichfield being a site lying between Land at Watery Land and East of Lichfield be taken forward . This has the double benefit of providing economic support to the historic core of Lichfield and erecting green belt.	Comments noted.
SIO543	Jon Flowith	13	Yes see response to question 12 and 11.	N/A
SIO544	Sam Lake (Turley) on behalf of Redrow Homes	10	Support Objective 1 in terms of creating sustainable communities including consolidating the sustainability of Burntwood as one of the District's two principal service centres. However, Objective 6 is focused on meeting the housing needs of LDC's residents when there is now a clear need to make an appropriate contribution to the housing needs of the wider HMA (see response to Q12).	The Review does include reference to the GBHMA shortfall. However it is recognised that the Plan Review will need to deal with cross boundary issues
SIO545	Sam Lake (Turley) on behalf of Redrow Homes	11	A density policy is not considered to be necessary. A prescriptive policy covering the whole District is likely to compromise the delivery of housing developments. In turn, it may lead to developments which are unattractive to the homebuyers and may, in turn, affect the viability of development. If there is a density policy, it should be specific to urban centres and public transport nodes and it must be sufficiently flexible in order to allow development to respond appropriately to its context and to remain viable.	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO546	Jon Flowith	17	In part see above comments The Strategic Growth Study Urban Extension as East of Lichfield would provide holistic economic support for business which will in turn support tourism.	Comments noted.
SIO547	Jon Flowith	18	No	Comments noted.
SIO548	Jon Flowith	20	No housing policies should actively encourage specialist housing to cover self-build plots for a range of small to large - encourage diverse housing, downsizing, extensions for families for grown rather than move, allow working from home, reduce commuting. Lichfield City Centre Polices provide holistic support for business which in turn support tourism. Policies for economic growth not jobs but better quality jobs in a high quality environment enables people to meet needs locally reducing transport journeys.	Comments noted.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO549	Sam Lake (Turley) on behalf of Redrow Homes	12	Redrow welcome LDC's acknowledgement of a likely unmet housing need across the HMA and LDC's commitment to assist. A local housing need assessment will need to be undertaken to assess the District's housing need, as well as the needs of the wider HMA. In advance of the publication of the revised NPPF and PPG, we wish to highlight the following points: It is important to recognise that the standard method will determine the minimum number of homes needed which represents the "starting point". LDC will need to consider whether economic growth aspirations and housing affordability pressures necessitate an enhanced housing requirement figure. The SGS is an important piece of evidence because it provides a consistent and up-to-date position on need across the whole HMA. It can be considered a robust assessment of need. The minimum shortfall across the HMA is in the order of 61,000 dwellings between 2011 and 2036. The appropriate scale of LDC's contribution to the HMA shortfall will need to be considered in detail as part of the local housing need assessment. This will need to consider existing economic and functional relationships with other local authorities which have shortfalls as well as future economic growth aspirations. Redrow consider that Lichfield is well placed to deliver a significant portion of the shortfall given its close proximity and strong relationship (including employment and commuting linkages) to Birmingham and the Black Country where the majority of the shortfall is arising. Whilst Lichfield includes Green Belt, development needs to be delivered in the most sustainable locations in accordance with para. 84 of the NPPF and there are large areas of land available within the District which are not subject to overriding/absolute environmental and/or physical constraints.	Comments noted. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield.
SIO550	Jon Flowith	21	Yes focusing growth around existing LDC areas in non-green belt locations has the advantage of using the services and amenities that exist in those areas and provides economic support for the historic core of Lichfield. This does not apply to the northern fringe of Birmingham Sutton Coldfield. The Little Aston area has no infrastructure amenities services to justify inclusion as an urban area appropriate for growth. Overriding reason is that this area forms the narrow little Aston Shenstone strategic gap which is one of the more important in the Greater Birmingham HMA and must be protected.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO551	Jon Flowith	22	LDC should accept recommendation of the Strategic Growth Study that the Urban Extension described as East of Lichfield must be taken forward.	Comments noted. The Strategic Growth Study is one piece of evidence which will support the Local Plan Review process.
SIO552	Jon Flowith	23	In part. Focussing growth to the north of Lichfield in a non-green belt location has the advantage of using the services and amenities that exist in the City centre and provides economic support for the historic core of Lichfield. Growth in Little Aston or Shenstone in the Green Belt is unacceptable.	Comments noted.
SIO553	Mr and Mrs Willets (Joanna Garland)	7	Promotes four parcels of land at Bassets Pole. Would like to see a new policy created especially for Bassets Pole. The area has significant potential due to its location and transport connections and should have its own policy for maximum benefit to be achieved.	Noted employment growth will be considered as part of the Review
SIO554	Mr and Mrs Willets (Joanna Garland)	31	Promotes four parcels of land at Bassets Pole. Do not agree that development should be focused on the existing employment areas located at Fradley, Burntwood and Lichfield City. Creation of employment in other areas including Bassets Pole should be seriously considered to allow opportunities for business and residents in the south of the district.	Over extends the flexibility of existing proposed Policy EMP1.
SIO555	Bovis Homes Ltd (Turleys)	22	In respect of land promoted north of Gillway Lane, Tamworth. The most sustainable option will be to focus future growth within and adjoining the main urban areas, including to the north of Tamworth, as well as the larger and more sustainable rural communities. Directing development to these settlements, rather than a more dispersed approach (Option 3) or new settlements (Option 4) also provides the opportunity to deliver more comprehensive development including infrastructure improvements through new development. Furthermore, the lead in times associated with a new settlement (Option 4) would impact the District's five year housing land supply and its ability to deliver the housing requirement over the Plan period. Given that the north of Tamworth has previously been identified and allocated as a sustainable location for growth in the adopted Local Plan Strategy, it is recommended that the development potential for this area is maximised, acknowledging the suitability and sustainability of development sites in this area. The Strategic Growth Study (February 2018) also concluded the north of Tamworth be identified as a 'Recommended Area of Search for Strategic Development' and as such it is recommended that the Local Plan Review seeks to further appraise and maximise the suitability of this area for future growth.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO556	Bovis Homes Ltd (Turleys)	23	<p>In respect of land promoted north of Gillway Lane, Tamworth.</p> <p>The most sustainable option will be to focus future growth within and adjoining the main urban areas, including to the north of Tamworth, as well as the larger and more sustainable rural communities. Directing development to these settlements, rather than a more dispersed approach (Option 3) or new settlements (Option 4) also provides the opportunity to deliver more comprehensive development including infrastructure improvements through new development. Furthermore, the lead in times associated with a new settlement (Option 4) would impact the District's five year housing land supply and its ability to deliver the housing requirement over the Plan period.</p> <p>Given that the north of Tamworth has previously been identified and allocated as a sustainable location for growth in the adopted Local Plan Strategy, it is recommended that the development potential for this area is maximised, acknowledging the suitability and sustainability of development sites in this area.</p> <p>The Strategic Growth Study (February 2018) also concluded the north of Tamworth be identified as a 'Recommended Area of Search for Strategic Development' and as such it is recommended that the Local Plan Review seeks to further appraise and maximise the suitability of this area for future growth.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO557	Mr and Mrs Willets (Joanna Garland)	32	<p>Promotes four parcels of land at Bassets Pole.</p> <p>Land at Bassets Pole should be considered for development</p>	Possible- area supported by the ELAA. The area has good road access but is washed over by Green Belt.
SIO558	Bovis Homes Ltd (Turleys)	24	<p>In respect of land promoted north of Gillway Lane, Tamworth.</p> <p>The most sustainable option will be to focus future growth within and adjoining the main urban areas, including to the north of Tamworth, as well as the larger and more sustainable rural communities. Directing development to these settlements, rather than a more dispersed approach (Option 3) or new settlements (Option 4) also provides the opportunity to deliver more comprehensive development including infrastructure improvements through new development. Furthermore, the lead in times associated with a new settlement (Option 4) would impact the District's five year housing land supply and its ability to deliver the housing requirement over the Plan period.</p> <p>Given that the north of Tamworth has previously been identified and allocated as a sustainable location for growth in the adopted Local Plan Strategy, it is recommended that the development potential for this area is maximised, acknowledging the suitability and sustainability of development sites in this area.</p> <p>The Strategic Growth Study (February 2018) also concluded the north of Tamworth be identified as a 'Recommended Area of Search for Strategic Development' and as such it is recommended that the Local Plan Review seeks to further appraise and maximise the suitability of this area for future growth.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO559	Jon Flowith	24	No: No evidence of capacity to sustain any meaningful growth in these locations has been proven some are in Green Belt which must be protected.	Comments noted.
SIO560	Jon Flowith	25	Yes see response to question 22.	Comment noted.
SIO561	Jon Flowith	26	Rural settlements are not appropriate as an overall housing supply strategy. They do not contain the services or infrastructure requirements for growth some are in green Belt which must be protected.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO562	Bovis Homes Ltd (Turleys)	25	<p>In respect of land promoted north of Gillway Lane, Tamworth.</p> <p>The most sustainable option will be to focus future growth within and adjoining the main urban areas, including to the north of Tamworth, as well as the larger and more sustainable rural communities. Directing development to these settlements, rather than a more dispersed approach (Option 3) or new settlements (Option 4) also provides the opportunity to deliver more comprehensive development including infrastructure improvements through new development. Furthermore, the lead in times associated with a new settlement (Option 4) would impact the District's five year housing land supply and its ability to deliver the housing requirement over the Plan period.</p> <p>Given that the north of Tamworth has previously been identified and allocated as a sustainable location for growth in the adopted Local Plan Strategy, it is recommended that the development potential for this area is maximised, acknowledging the suitability and sustainability of development sites in this area.</p> <p>The Strategic Growth Study (February 2018) also concluded the north of Tamworth be identified as a 'Recommended Area of Search for Strategic Development' and as such it is recommended that the Local Plan Review seeks to further appraise and maximise the suitability of this area for future growth.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO563	Mr and Mrs Willets (Joanna Garland)	33	<p>Promotes four parcels of land at Bassets Pole.</p> <p>Development of land at Slade Farm may bring the opportunity to upgrade Slade Lane. Changes the local road network when the M6 Toll road was built forced a significant amount of traffic to use the single track Slade Lane. This lane which is within the West Midlands bounds Slade Farm on the western side and cannot accommodate the amount of traffic it currently experiences and would benefit hugely from being widened. Alternatively, a through - road across the centre of the new development at Slade Farm connecting the A453 and Slade Road would relieve this pressure.</p>	Over extends the flexibility of existing proposed Policy EMP1. Slade Farm is out of district and a further route is not a strategic priority
SIO564	Bovis Homes Ltd (Turleys)	26	<p>In respect of land promoted north of Gillway Lane, Tamworth.</p> <p>The most sustainable option will be to focus future growth within and adjoining the main urban areas, including to the north of Tamworth, as well as the larger and more sustainable rural communities. Directing development to these settlements, rather than a more dispersed approach (Option 3) or new settlements (Option 4) also provides the opportunity to deliver more comprehensive development including infrastructure improvements through new development. Furthermore, the lead in times associated with a new settlement (Option 4) would impact the District's five year housing land supply and its ability to deliver the housing requirement over the Plan period.</p> <p>Given that the north of Tamworth has previously been identified and allocated as a sustainable location for growth in the adopted Local Plan Strategy, it is recommended that the development potential for this area is maximised, acknowledging the suitability and sustainability of development sites in this area.</p> <p>The Strategic Growth Study (February 2018) also concluded the north of Tamworth be identified as a 'Recommended Area of Search for Strategic Development' and as such it is recommended that the Local Plan Review seeks to further appraise and maximise the suitability of this area for future growth.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO565	Sam Lake (Turley) on behalf of Redrow Homes	21 - 30	<p>The following provides a composite response to Questions 21 to 30. Redrow consider that the focus for development should continue to be around existing main urban areas, including urban extensions. Given the lack of available land it will be necessary to release land from the Green Belt. Burntwood is one of the most sustainable settlements as concluded by the SA. The SA concluded that additional growth at Burntwood would assist in the delivery of a more sustainable, healthier and self-contained town having regard the number and range of services and facilities within the settlement. It is a settlement which requires inward investment to ensure that the economy and existing centres can grow commensurate with the population. Directing the majority of development to the two main settlements of Lichfield and Burntwood, is considered to represent the best opportunity to sustain existing settlements and deliver more comprehensive development including infrastructure improvements facilitated by new development.</p> <p>It is important to stress that the dispersal of development under Option 3 would lead to increased levels of unsustainable commuting to and from the villages and would fail to deliver the necessary infrastructure. In relation to Option 4, new settlements have significant lead-in times.</p> <p>The land south of Highfields Road, Burntwood has been identified within LDC's own evidence as a sustainable and deliverable site which is appropriate for release from the Green Belt for residential development. We contend that the site provides the most sustainable and deliverable residential opportunity at Burntwood and commend the site to LDC for Green Belt release and allocation within the Preferred Options version of the LPR.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO566	Jon Flowith	27	Yes see response to question 22.	Comment noted.
SIO567	Bovis Homes Ltd (Turleys)	27	<p>In respect of land promoted north of Gillway Lane, Tamworth.</p> <p>The most sustainable option will be to focus future growth within and adjoining the main urban areas, including to the north of Tamworth, as well as the larger and more sustainable rural communities. Directing development to these settlements, rather than a more dispersed approach (Option 3) or new settlements (Option 4) also provides the opportunity to deliver more comprehensive development including infrastructure improvements through new development. Furthermore, the lead in times associated with a new settlement (Option 4) would impact the District's five year housing land supply and its ability to deliver the housing requirement over the Plan period.</p> <p>Given that the north of Tamworth has previously been identified and allocated as a sustainable location for growth in the adopted Local Plan Strategy, it is recommended that the development potential for this area is maximised, acknowledging the suitability and sustainability of development sites in this area.</p> <p>The Strategic Growth Study (February 2018) also concluded the north of Tamworth be identified as a 'Recommended Area of Search for Strategic Development' and as such it is recommended that the Local Plan Review seeks to further appraise and maximise the suitability of this area for future growth.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO568	Jon Flowith	28	No Shenstone Area New Settlement should be omitted.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. The Strategic Growth Study is one piece of this evidence and provides a number of options for authorities to test, these are incorporated into the Scope, Issues & Options document.
SIO569	Jon Flowith	29	No	Comment noted.
SIO570	Jon Flowith	30	No	Comment noted.
SIO571	Jon Flowith	31	Yes as the most appropriate employment development access and capacity exists in these locations.	Comments noted
SIO572	Jon Flowith	37	Yes see response to question 22.	Comment noted.
SIO573	Jon Flowith	39	Yes	Comments noted
SIO574	Bovis Homes Ltd (Turleys)	28	<p>In respect of land promoted north of Gillway Lane, Tamworth.</p> <p>The most sustainable option will be to focus future growth within and adjoining the main urban areas, including to the north of Tamworth, as well as the larger and more sustainable rural communities. Directing development to these settlements, rather than a more dispersed approach (Option 3) or new settlements (Option 4) also provides the opportunity to deliver more comprehensive development including infrastructure improvements through new development. Furthermore, the lead in times associated with a new settlement (Option 4) would impact the District's five year housing land supply and its ability to deliver the housing requirement over the Plan period.</p> <p>Given that the north of Tamworth has previously been identified and allocated as a sustainable location for growth in the adopted Local Plan Strategy, it is recommended that the development potential for this area is maximised, acknowledging the suitability and sustainability of development sites in this area.</p> <p>The Strategic Growth Study (February 2018) also concluded the north of Tamworth be identified as a 'Recommended Area of Search for Strategic Development' and as such it is recommended that the Local Plan Review seeks to further appraise and maximise the suitability of this area for future growth.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO575	Jon Flowith	41	See previous comments	Comments noted
SIO576	Mr and Mrs Willets (Joanna Garland)	34	<p>Promotes four parcels of land at Bassets Pole.</p> <p>Strongly agree with the location identified for development at Bassets Pole.</p>	Comments noted

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO577	Bovis Homes Ltd (Turleys)	29	<p>In respect of land promoted north of Gillway Lane, Tamworth.</p> <p>The most sustainable option will be to focus future growth within and adjoining the main urban areas, including to the north of Tamworth, as well as the larger and more sustainable rural communities. Directing development to these settlements, rather than a more dispersed approach (Option 3) or new settlements (Option 4) also provides the opportunity to deliver more comprehensive development including infrastructure improvements through new development. Furthermore, the lead in times associated with a new settlement (Option 4) would impact the District's five year housing land supply and its ability to deliver the housing requirement over the Plan period.</p> <p>Given that the north of Tamworth has previously been identified and allocated as a sustainable location for growth in the adopted Local Plan Strategy, it is recommended that the development potential for this area is maximised, acknowledging the suitability and sustainability of development sites in this area.</p> <p>The Strategic Growth Study (February 2018) also concluded the north of Tamworth be identified as a 'Recommended Area of Search for Strategic Development' and as such it is recommended that the Local Plan Review seeks to further appraise and maximise the suitability of this area for future growth.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO578	Bovis Homes Ltd (Turleys)	30	<p>In respect of land promoted north of Gillway Lane, Tamworth.</p> <p>The most sustainable option will be to focus future growth within and adjoining the main urban areas, including to the north of Tamworth, as well as the larger and more sustainable rural communities. Directing development to these settlements, rather than a more dispersed approach (Option 3) or new settlements (Option 4) also provides the opportunity to deliver more comprehensive development including infrastructure improvements through new development. Furthermore, the lead in times associated with a new settlement (Option 4) would impact the District's five year housing land supply and its ability to deliver the housing requirement over the Plan period.</p> <p>Given that the north of Tamworth has previously been identified and allocated as a sustainable location for growth in the adopted Local Plan Strategy, it is recommended that the development potential for this area is maximised, acknowledging the suitability and sustainability of development sites in this area.</p> <p>The Strategic Growth Study (February 2018) also concluded the north of Tamworth be identified as a 'Recommended Area of Search for Strategic Development' and as such it is recommended that the Local Plan Review seeks to further appraise and maximise the suitability of this area for future growth.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO579	Bovis Homes Ltd (Turleys)	38	For the reasons set out in response to Q20, the IDP will also need to consider cross-boundary infrastructure requirements given the District's commitment to meet the unmet housing needs of Tamworth and the Greater Birmingham HMA.	Comments noted
SIO580	Property Land Projects	Whole Document	<p>Submit site at 2 Ashcroft Lane, Shenstone (0.5 acres) for development. Sets out the benefits of the site and confirms the site could be developed in a manner which reflects the character of the area and the existing street scene.</p> <p>The support of small scale redevelopment is set out in Policy Shen4. The need to ensure that any new housing is accommodated whilst maintaining a self-contained community with clear physical boundaries, and which complements the character of the existing settlement, is also supported in full. reuse of land infilling development within existing build form is key to achieving the objective. The entire village is surrounded by Green Belt, it is appropriate through the Neighbourhood Plan process to put forward potential revisions to the Green Belt boundary.</p> <p>The Neighbourhood Plan recognises large underused garden areas provide an opportunity for a significant amount of new housing to be progressed through infill development. It is appropriate to identify those sites within the existing built form of the settlement where infill development can make a contribution towards additional housing, notwithstanding the current Green Belt designation.</p> <p>Support is given to the detailed text given in housing policy H2, however, the benefits of infill development to promote organic growth and the provision of new homes should include infill plots or redevelopment opportunities on sites within the Green Belt and reflected in GB1, together with provision for Green Belt site releases to ensure that the residential and redevelopment objectives of the Neighbourhood plan can more realistically be met.</p>	This Review is part of the Development Plan to guide the future of the Shenstone Neighbourhood Plan.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO581	Bovis Homes Ltd (Turleys)	39	<p>Question 20: For the reasons set out in response to Q20, the IDP will also need to consider cross-boundary infrastructure requirements given the District's commitment to meet the unmet housing needs of Tamworth and the Greater Birmingham HMA. (In respect of land promoted north of Gillway Lane, Tamworth.</p> <p>Given Lichfield's outstanding commitment to contribute towards Tamworth's unmet housing needs, it is recommended that the IDP is updated so that it considers how infrastructure could be improved in neighbouring authorities; to support development located either close to or across several administrative boundaries. For example, the land north of Gillway Lane, Tamworth, will benefit from road improvements at Gungate Junction (located in Tamworth Borough Council administrative boundary) and as such this infrastructure improvement should be included within Lichfield's IDP.</p>	Comments noted: The District Council is committed to working in cooperation with neighbouring authorities to ensure appropriate infrastructure response.
SIO582	Mr Richard Thorne on behalf of Mrs F E James	Whole document	<p>We welcome LDC's commitment to review the Local Plan in full which is considered appropriate given the significant housing shortfall identified across the Greater Birmingham Housing Market Area and the need to identify the correct mechanism to identify the appropriate contribution from LDC towards this unmet need. Promotion of 23.5ha of land at Sandyway Farm, Walsall Road, Lichfield, which represents sustainable and deliverable residential land. The site is approximately 1.4km to the south west of Lichfield City Centre. A Site Location Plan is enclosed with these representations. The Plan period is considered sound, although should the current LPR slip it would be necessary to extend. As part of any future Vision and strategy for growth, as the most sustainable settlement in the District Lichfield must remain a key focus for development. In order to deliver this strategy and deliver new homes in the most sustainable locations, it will be necessary to release land from the Green Belt. It will also be necessary for the Vision to acknowledge LDC's responsibility in contributing to the unmet housing needs of the Greater Birmingham HMA to 2036. Option 3, as considered by LDC would lead to increased levels of unsustainable commuting to and from the villages. Option 4, proposes delivering new settlements. New settlements have significant lead-in times and this option would therefore fail to deliver all of the housing needs throughout LPR plan period, with housing completions unlikely until the 2030s. Both of these options are unlikely to deliver the District's housing needs in the most sustainable locations.</p>	Comments noted.
SIO583	Prologis (Delta Planning)	3	<p>Pleased to note that employment is specifically identified as one of the key cross-boundary issues within the consultation document. Often employment land requirements take a back seat to housing needs despite the fact that sub-regional study after study has identified a significant shortfall in the provision of strategic employment land across the West Midlands. Whether and what role Lichfield can and should play in addressing these strategic employment land requirements needs to be fully investigated through the Local Plan Review.</p> <p>The consultation document identifies 14 main issues facing the District and raises the question whether any other issues need to be explored. Considers that with regard to employment, the main issues have been identified; the Local Plan Review seeks to meet the strategic employment requirements (Issues 1), facilitate a wider range of employment within the District (Issue 4) and make Lichfield District a desirable place for business to locate and invest (Issue 7).</p>	Comments noted
SIO584	Prologis (Delta Planning)	8	<p>Pleased to note that employment is specifically identified as one of the key cross-boundary issues within the consultation document. Often employment land requirements take a back seat to housing needs despite the fact that sub-regional study after study has identified a significant shortfall in the provision of strategic employment land across the West Midlands. Whether and what role Lichfield can and should play in addressing these strategic employment land requirements needs to be fully investigated through the Local Plan Review.</p> <p>The consultation document identifies 14 main issues facing the District and raises the question whether any other issues need to be explored. Considers that with regard to employment, the main issues have been identified; the Local Plan Review seeks to meet the strategic employment requirements (Issues 1), facilitate a wider range of employment within the District (Issue 4) and make Lichfield District a desirable place for business to locate and invest (Issue 7).</p>	Comments noted
SIO585	Prologis (Delta Planning)	9	<p>With regard to the vision and strategic priorities for Lichfield District, agrees that the vision and objectives set out in the 2015 Local Plan Strategy remain broadly relevant. However, given that a key issue for the District is the need to provide for employment growth, considers that this should form a stronger part of the vision for the District. The vision also needs to be amended to take account of the wider cross-boundary issues that need to be tackled and no longer limit it to addressing needs arising within Rugeley and Tamworth.</p>	Comments noted, a review of the visions' reference to employment growth will be undertaken
SIO586	Prologis (Delta Planning)	10	<p>With regard to the vision and strategic priorities for Lichfield District, agrees that the vision and objectives set out in the 2015 Local Plan Strategy remain broadly relevant. However, given that a key issue for the District is the need to provide for employment growth, considers that this should form a stronger part of the vision for the District. The vision also needs to be amended to take account of the wider cross-boundary issues that need to be tackled and no longer limit it to addressing needs arising within Rugeley and Tamworth.</p>	This is addressed in response to the vision comments

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO587	Prologis (Delta Planning)	31	<p>Agree with Question 31 that future employment growth should be focussed on existing employment areas (Option 1).</p> <p>With particular regard to Fradley Park, considers that this existing employment area offers the best opportunity for future growth. The area has grown into the main employment area in the District over the last two decades years and the recent success of the Prologis development south of Wood End Lane has further cemented its credentials as being a highly attractive location for business. Further land is available south of the Prologis site between current and approved development land and the route of HS2 and submits that this area should provide the main focus for further growth. It is a well contained site that can be easily integrated into the existing employment park. Furthermore it lies close to the A38 and does not raise any significant residential amenity issues as it is remote from Fradley village.</p> <p>Notwithstanding the above support for Option 1 and in particular growth south of Fradley Park, the Council should not rule out a blend of Options 1 and 2 as the final solution to meeting future employment growth in circumstances where a new suitable location becomes available. In reply to Question 34 however as to whether the suggested new locations could be appropriate, we would comment that neither Seedy Mill nor Shenstone would offer the level of highway infrastructure access to make a new location attractive. A wider search of sites might be appropriate to support Option 2.</p> <p>The Local Plan Review should, in the main, pursue Employment Growth Option 1 and in particular include an option to allocate additional land to the south of Fradley Park up to the line of HS2. The Council should also consider keeping an open mind to newly identified locations should such become apparent during the early stages of plan preparation.</p>	Comments noted. Fradley Park; and other unfocused employment areas, as well as Seedy Mill and Shenstone, will be considered as part of the wider Housing and Economic Development Needs Assessment evidence for the Local Plan.
SIO588	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	Whole Document	<p>Supports Council's decision to review the Local Plan. The 'Scope, Issues and Options' consultation rightfully highlights a number of key changes that have occurred since the adoption of the Local Plan Strategy, including further evidence to determine the scale of unmet housing needs that are present within the wider Greater Birmingham and Black Country Housing Market Area (HMA). The review also provides a good opportunity to ensure alignment with the proposed revised NPPF which is expected to be introduced this summer.</p> <p>Promotion of 15ha of land at Watford Gap, Shenstone Wood End for approx. 395 homes.</p>	Agreed.
SIO589	Prologis (Delta Planning)	33	<p>Agree with Question 31 that future employment growth should be focussed on existing employment areas (Option 1).</p> <p>With particular regard to Fradley Park, considers that this existing employment area offers the best opportunity for future growth. The area has grown into the main employment area in the District over the last two decades years and the recent success of the Prologis development south of Wood End Lane has further cemented its credentials as being a highly attractive location for business. Further land is available south of the Prologis site between current and approved development land and the route of HS2 and submits that this area should provide the main focus for further growth. It is a well contained site that can be easily integrated into the existing employment park. Furthermore it lies close to the A38 and does not raise any significant residential amenity issues as it is remote from Fradley village.</p> <p>Notwithstanding the above support for Option 1 and in particular growth south of Fradley Park, the Council should not rule out a blend of Options 1 and 2 as the final solution to meeting future employment growth in circumstances where a new suitable location becomes available. In reply to Question 34 however as to whether the suggested new locations could be appropriate, we would comment that neither Seedy Mill nor Shenstone would offer the level of highway infrastructure access to make a new location attractive. A wider search of sites might be appropriate to support Option 2.</p> <p>The Local Plan Review should, in the main, pursue Employment Growth Option 1 and in particular include an option to allocate additional land to the south of Fradley Park up to the line of HS2. The Council should also consider keeping an open mind to newly identified locations should such become apparent during the early stages of plan preparation.</p>	See response to representation SIO587
SIO590	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	1	<p>The plan period of 2020-2036 is considered appropriate and in line with the guidance contained in the NPPF. In addition, a Plan period to 2036 would be aligned with the Greater Birmingham and Black Country HMA Strategic Growth Study, published in February 2018, which considers the housing need, supply and shortfall across this wider area to the same timeframe of 2036.</p>	Comments noted

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO591	Prologis (Delta Planning)	34	<p>Agree with Question 31 that future employment growth should be focussed on existing employment areas (Option 1).</p> <p>With particular regard to Fradley Park, considers that this existing employment area offers the best opportunity for future growth. The area has grown into the main employment area in the District over the last two decades years and the recent success of the Prologis development south of Wood End Lane has further cemented its credentials as being a highly attractive location for business. Further land is available south of the Prologis site between current and approved development land and the route of HS2 and submits that this area should provide the main focus for further growth. It is a well contained site that can be easily integrated into the existing employment park. Furthermore it lies close to the A38 and does not raise any significant residential amenity issues as it is remote from Fradley village.</p> <p>Notwithstanding the above support for Option 1 and in particular growth south of Fradley Park, the Council should not rule out a blend of Options 1 and 2 as the final solution to meeting future employment growth in circumstances where a new suitable location becomes available. In reply to Question 34 however as to whether the suggested new locations could be appropriate, we would comment that neither Seedy Mill nor Shenstone would offer the level of highway infrastructure access to make a new location attractive. A wider search of sites might be appropriate to support Option 2.</p> <p>The Local Plan Review should, in the main, pursue Employment Growth Option 1 and in particular include an option to allocate additional land to the south of Fradley Park up to the line of HS2. The Council should also consider keeping an open mind to newly identified locations should such become apparent during the early stages of plan preparation.</p>	Comments noted. Fradley Park; and other unfocused employment areas, as well as Seedy Mill and Shenstone, will be considered as part of the wider Housing and Economic Development Needs Assessment evidence for the Local Plan.
SIO592	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	2	<p>There are a number of evidence base studies which require updating: In light of the Local Plan Review having committed to consider the housing unmet needs of the Greater Birmingham and Black Country HMA it is considered that the Green Belt Review is a key piece of evidence which requires updating to take account of these strategic needs, serving a much wider area than just the local housing needs of Lichfield District. Such a review should include the Green Belt around the north of Birmingham/Sutton Coldfield which lies within the administrative boundary of Lichfield District.</p> <p>A refreshed SHMA should be prepared in line with the latest projections (including the 2016- based sub-national household projections when published). It is recommended that further sensitivity testing of the Standard Methodology (recently consulted on) is undertaken. In particular, the Council should work with the Local Enterprise Partnership to understand the level of economic growth that the District is aiming to achieve and understand the implications for housing growth. It is important that Lichfield District helps its neighbours meet any shortfall in housing need, particularly given that Lichfield District is within close proximity by sustainable means. It is also considered that the primary evidence base in relation to affordable housing needs refreshing.</p> <p>The Council's Rural Settlement Sustainability Study requires updating. The study acknowledges that it captures a "moment in time" and thus for some settlements where development has recently occurred, and new services and facilities provided, the scorings will have changed. This may result in necessitating further consideration of amendments to the hierarchy of settlements within the Council's spatial strategy for the Local Plan Review. Shenstone Wood End has a range of services and facilities with good public transport links, such as Blake Street train station. The update to the RSSS should reflect the existing services and facilities within Shenstone Wood End.</p> <p>A review of the Cannock Chase SAC Evidence Base was published in September 2017 which essentially acted as a check on whether the Strategic Access Management and Monitoring Measures (SAMMM) are still fit for purpose, in light of current Local Plan predicted housing delivery. The Review concluded that the approach remained fit for purpose for currently adopted local plans, but that there are some aspects of the approach that should now be the focus of a full review and upgrade to a more comprehensive strategy in the near future. This approach is fully supported.</p> <p>Although it is recognised that the Infrastructure Delivery Plan (IDP) is a living document it is considered that there are a number of evidence base studies on infrastructure which will require updating to assess the emerging spatial options for the Local Plan Review. With regard to Transport evidence an 'Appraisal of Spatial Options' was published in November 2008 and a 'Draft Integrated Transport Strategy' in November 2011. Both of these pieces of evidence will require refreshing, and the Draft Integrated Transport Strategy will particularly need updating to take account of recent housing and employment development in Lichfield City and Burntwood. Other pieces of evidence relating to infrastructure which are considered to now be out of date and in need of updating include those studies relating to indoor sports and recreation, playing pitches, health and well-being, air quality, biodiversity, renewable and low-carbon energy and water resources and supply.</p> <p>It is considered of paramount importance that a Viability Assessment is undertaken alongside the Local Plan Review</p>	<p>Comments noted, consideration of a Green Belt Review will be undertaken</p> <p>Consideration to undertaking a HEDNA will be undertaken</p> <p>Consideration of updating the RSSS will be undertaken</p>

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO593	Gladman Developments (Mat Evans)	Whole document	<p>At the present time there is a great deal of uncertainty as to how the unmet housing needs of Birmingham and the Black Country are going to be met, now therefore is a good time for Lichfield to review its plan and to give more thought to how it can help contribute to meeting these needs.</p> <p>The location of new development will be key to ensuring prompt delivery as well as the necessary funding for needed infrastructure improvements. We believe that there are opportunities in many of the settlements outlined in the Local Plan review, we would note that the rural areas (often starved of growth) may be able to make significant contribution to ensuring needs are met.</p>	Comments noted.
SIO594	Barwood Land (Rebecca Mitchell)	Whole Document	<p>Housing Requirements and Duty to Cooperate Note the absence of a proposed housing requirement figure for the area, or supporting evidence base at this early stage of the process. Welcome opportunity to comment in due course. It is important there is robust evidence base and discussions amongst the relevant authorities on the distribution of any identified unmet housing needs for the LPR to be found sound.</p> <p>Housing Growth Options: North of Tamworth Given the SoS decision to grant permission at Arkall Farm there is no requirement to review the existing policies relating to North of Tamworth BDL or the proposed allocation of Arkall Farm. Strongly support the option to direct growth to the North of Tamworth. This area ranks highly in the Strategic Growth Study and is one of the most strong performing options as having potential to help meet the unmet needs of the housing market area. North of Tamworth is a sustainable location for housing growth, close to existing shops and services. The site is not within the Green Belt and is not constrained by any national or local environmental designations. Strongly advocate that this area should be assessed and considered as a preferred option for growth.</p>	Housing requirement figure not established yet, awaiting Government guidance.
SIO594	Barwood Land (Rebecca Mitchell)	Whole Document	<p>Housing Requirements and Duty to Cooperate Note the absence of a proposed housing requirement figure for the area, or supporting evidence base at this early stage of the process. Welcome opportunity to comment in due course. It is important there is robust evidence base and discussions amongst the relevant authorities on the distribution of any identified unmet housing needs for the LPR to be found sound.</p> <p>Housing Growth Options: North of Tamworth Given the SoS decision to grant permission at Arkall Farm there is no requirement to review the existing policies relating to North of Tamworth BDL or the proposed allocation of Arkall Farm. Strongly support the option to direct growth to the North of Tamworth. This area ranks highly in the Strategic Growth Study and is one of the most strong performing options as having potential to help meet the unmet needs of the housing market area. North of Tamworth is a sustainable location for housing growth, close to existing shops and services. The site is not within the Green Belt and is not constrained by any national or local environmental designations. Strongly advocate that this area should be assessed and considered as a preferred option for growth.</p>	Housing requirement figure not established yet, awaiting Government guidance.
SIO595	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	3	The Council has identified a number of key issues to consider under the Duty to Co-operate. With regard to meeting the unmet needs of Greater Birmingham the District Council has stated its commitment to engaging with its neighbours, this should also encompass consideration of Tamworth's housing needs. In addition, concerns remain about how the housing shortfall will be addressed across the HMA. It is noted that the application of the standard method for assessing local housing need, sets out a minimum figure considering household projections and affordability ratios, and does not take into account other relevant factors, including cross boundary needs as well as other considerations (as set out earlier in this response). It is the case that Lichfield District's overall housing figure should be reflective of strategic cross boundary housing needs and therefore represents a far higher number than that set out in the DCLG standard methodology.	Tamworth's needs are part of the GBBCHMA
SIO596	Barwood Land (Rebecca Mitchell)	13	Agree it is important to support the delivery of custom and self build housing but would not support a policy that requires a proportion of these types of homes to be provided for on allocated housing sites. It is difficult to evidence for or the likely delivery of self build homes over the plan period and believe a policy of this nature could be harmful. Encourages the Council to consider an alternative policy approach whereby specific small allocations are identified for self-build and custom build which would accord with emerging national policy. In addition, a general policy which supports custom and self-build homes on suitable and sustainable sites could help to boost housing supply in the area, through windfalls or potentially identified in Neighbourhood Plans.	Comments noted. This will be considered further as the Local Plan Review progresses and will be informed by a range of evidence.
SIO597	Gladman Developments (Mat Evans)	1	Considers the plan period of 2020-2036 to be a reasonable approach, however the Council needs to ensure that the timetable for the plan review does not slip, and that the plan has a 15 year life span when adopted.	Comments noted
SIO598	Gladman Developments (Mat Evans)	2	In addition to the documents contained within Appendix A it is considered that the Council will need to consider two additional documents relating to its housing provision. The Council will need to prepare a MoU with its neighbouring authorities to ensure that all housing needs arising in the housing market area and potentially neighbouring HMAs are met. The second piece of evidence the Council needs will be a detailed further consideration as to Lichfield's ability to contribute to unmet housing needs coming from Birmingham and/or the Black Country.	<p>Consideration to undertaking a HEDNA will be undertaken</p> <p>MoU/ SoCG will be prepared where appropriate.</p>

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO599	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	4	Agree that the policies in Table 1.2 will require either significantly amending or replacing, as most of these policies are connected with implementing the current spatial strategy for the District.	Comments noted
SIO600	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	5	Whilst it is agreed that the policies in Table 1.3 require minor amendments, it is considered that there are several others which also require minor amendments to either bring them into line with current national policy or update them in the light of further evidence. These are as follows: <ul style="list-style-type: none"> Core Policy 8: Our Centres will need to be updated in light of recent development for retail, leisure, office and cultural facilities which has occurred within the commercial centres of Burntwood and Lichfield City and in other settlements, and this may necessitate changes to the Hierarchy of Centres. Policy E1: Retail Assessments include thresholds for retail assessments will need to be amended in line with updated local retail evidence, once the spatial strategy for the Local Plan Review has been determined and the relevant floorspace requirements are known. 	Comments noted, policy CP 8 and E1 will be considered through the Review.
SIO601	Bloor Homes (Define)	Whole Document	Land interests at Shenstone Outlines the National Policy Context, making reference to Para 7, 9, 14, 17 and 47 relating to housing needs and Para 54, 179 and 181 relating to the duty to cooperate. Welcome the LPR and the proposed plan period to 2036 to address the needs arising in the District and appropriately address unmet needs arising from the HMA and those in Tamworth is supported to ensure the NPPF's policy imperatives are being effectively addressed.	Comments noted.
SIO602	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	6	Policy Burntwood 5 is now considered to be out of date as the development is almost built out. Policy East of Rugeley is now out-of-date and requires amending accordingly. Policy North of Tamworth may require amendment through the review process as this policy indicates a Broad Development Location for around 1,000 homes located around Arkall Farm. However, the planning consent for up to 1,000 dwellings and associated facilities at this location (application ref: 14/00516/OUTMEI) contains a number of triggers that place doubt on the level of homes likely to be delivered in this location to 2036.	The location of new growth will need to be considered during the Review
SIO603	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	7	A trigger for a further review of the Local Plan should be incorporated. In the interest of maintaining a continuous supply of housing to meet identified needs it is considered that reserve sites should be identified within the Local Plan Review. Consideration also needs to be given to safeguarded land, in order that Green Belt sites on the edge of settlements may be able to be brought forward for development in the longer term, should the need arise. Both the current and the Draft NPPF state that where necessary, areas of safeguarded land between the urban area and the Green Belt should be identified in Local Plans, in order to meet longer-term development needs.	A review trigger would only be necessary were there something specific that might trigger a review ahead of the NPPF 5 year review timetable
SIO604	Gladman Developments (Mat Evans)	3	Key cross boundary figures have been appropriately identified. The Council may need to be cognitive of what is happening in other adjacent HMAs should they have particular problems in meeting identified needs.	Comments noted
SIO605	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	8	Whilst Chapter 2 'Spatial Portrait of Lichfield District' of the consultation document highlights the issues facing the District, it is considered that the list of issues in Table 3.1 reads more as a set of objectives, with only numbers 2, 3 and 9 setting out issues to be addressed	Comments noted a review of the objectives and there delivery will be undertaken
SIO606	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	9	It is considered that the vision and approach set out in the Local Plan remains relevant and is supported. However, it is also considered that the vision could be more ambitious as reference could be made to the opportunities presented to the District by its role within the wider West Midlands region, with projects such as HS2 and the Commonwealth Games due to come to fruition within the period covered by this Local Plan Review.	Comments noted sub-regional, regional and national initiatives will need to be assessed to identify whether there is scope to incorporate within the vision
SIO607	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	10	Whilst the majority of the Strategic Priorities are considered to remain broadly relevant for the Local Plan Review, Strategic Priority 6 refers only to meeting the needs of the residents of Lichfield District. It is considered that this should be amended to also refer to meeting the unmet housing needs of the HMA.	The Review does include reference to the GBHMA shortfall. However it is recognised that the Plan Review will need to deal with cross boundary issues
SIO608	Bloor Homes (Define)	1	Land interests at Shenstone A plan period to 2036 would align with the GBHMA SGS. On that basis the plan period is supported, however this must be on the basis that the LPR will reflect the evolving strategic context that the identified development needs in the District and across the HMA are provided for throughout the plan period.	Comments noted
SIO609	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	11	Summary of NPPF and draft NPPF paragraphs. As Lichfield District is very diverse in terms of housing density across the District it is considered that if density standards are incorporated within the Local Plan Review, then these should be minimum standards determined by reference to the character of the local area and the housing mix as determined by local needs. In accordance with emerging national guidance the Council may wish to consider a variety of density standards for different locations.	Comments noted. The GBHMA Strategic Growth Study concludes it would be reasonable to assume minimum densities of 35 dwellings per hectare in Lichfield. This will be considered further as the Local Plan review progresses.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO610	Gladman Developments (Mat Evans)	4	Agree with the Council's analysis of which policies will require more amendment than others. However, when further work has been done on the HMA wide housing and employment needs it may be necessary to further reconsider some of the policies currently proposed for minor amendments. For example the policies on infrastructure, or any policies which consider local designations which may need to have their value weighed against the need for increased level of housing or employment land provision.	Comments noted
SIO611	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	12	It is considered that Lichfield District Council should assist in meeting the unmet housing needs of the HMA through identifying additional land for development in sustainable locations and in making best use of existing infrastructure with strong links to the conurbation (Birmingham). This may require a spatial development strategy that maximises growth options in a range of settlements and locations to boost significantly the delivery of new homes. In assisting with meeting these needs the District Council should also give consideration to potential benefits that could be delivered for the District, such as unlocking Government funding for growth and aligning future development with economic aspirations in delivering the Council's and the LEP objectives.	Comments noted. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield.
SIO612	Gladman Developments (Mat Evans)	5	Agree with the Council's analysis of which policies will require more amendment than others. However, when further work has been done on the HMA wide housing and employment needs it may be necessary to further reconsider some of the policies currently proposed for minor amendments. For example the policies on infrastructure, or any policies which consider local designations which may need to have their value weighed against the need for increased level of housing or employment land provision.	Comments noted
SIO613	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	13	Self-build and custom housebuilding has been identified as a significant element of the Government's agenda to increase housing supply. National policy supports self build. With regard to facilitating the provision of self-build and custom build housing the identification of specific sites for such development is favoured, as this option would have a greater chance of ensuring that the needs of local people wishing to build their own homes are met. It is recommended that these sites are specifically allocated as self-build/custom build housing sites.	Comments noted. This will be considered further as the Local Plan Review progresses and will be informed by a range of evidence.
SIO614	Gladman Developments (Mat Evans)	6	Agree with the Council's analysis of which policies will require more amendment than others. However, when further work has been done on the HMA wide housing and employment needs it may be necessary to further reconsider some of the policies currently proposed for minor amendments. For example the policies on infrastructure, or any policies which consider local designations which may need to have their value weighed against the need for increased level of housing or employment land provision.	Comments noted
SIO615	Gladman Developments (Mat Evans)	8	Broadly agrees with the issues facing the District and the vision and strategic objectives to meet those issues. Consider that the Issues, Vision and Strategic Objectives would benefit from making clear that the housing and economic needs for Lichfield may involve the delivery of unmet housing needs and associated economic needs from Greater Birmingham in addition to those of Lichfield. We would suggest that in paragraph 2 of the Vision for the district Greater Birmingham is included alongside Rugby and Tamworth when the Council is talking about having a role to play in meeting the needs of other districts. Similarly strategic objective 6 should include reference to the housing needs of other districts.	The Review does include reference to the GBHMA shortfall. Comments noted, matters raised here will need to be considered in the context of settlement growth. This could impact the vision
SIO616	Gladman Developments (Mat Evans)	9	Broadly agrees with the issues facing the District and the vision and strategic objectives to meet those issues. Consider that the Issues, Vision and Strategic Objectives would benefit from making clear that the housing and economic needs for Lichfield may involve the delivery of unmet housing needs and associated economic needs from Greater Birmingham in addition to those of Lichfield. We would suggest that in paragraph 2 of the Vision for the district Greater Birmingham is included alongside Rugby and Tamworth when the Council is talking about having a role to play in meeting the needs of other districts. Similarly strategic objective 6 should include reference to the housing needs of other districts.	The Review does include reference to the GBHMA shortfall.
SIO617	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	14	Other options used by LPA's include undertaking a strategic review of land within their ownership to identify smaller plots and proactively identify sites and establish if they are suitable for self and custom build. Planning briefs could be prepared for suitable sites to provide some certainty for prospective buyers. However, it is recognised that this approach is not always suitable, as many LPAs do not have large land-holdings and there are often issues of resourcing and financial liabilities to be resolved for such an approach to work.	Comments noted. This will be considered further as the Local Plan Review progresses and will be informed by a range of evidence.
SIO618	Gladman Developments (Mat Evans)	10	Broadly agrees with the issues facing the District and the vision and strategic objectives to meet those issues. Consider that the Issues, Vision and Strategic Objectives would benefit from making clear that the housing and economic needs for Lichfield may involve the delivery of unmet housing needs and associated economic needs from Greater Birmingham in addition to those of Lichfield. We would suggest that in paragraph 2 of the Vision for the district Greater Birmingham is included alongside Rugby and Tamworth when the Council is talking about having a role to play in meeting the needs of other districts. Similarly strategic objective 6 should include reference to the housing needs of other districts.	The Review does include reference to the GBHMA shortfall (this includes Tamworth's needs). However it is recognised that the Plan Review will need to deal with cross boundary issues

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO619	AONB Partnership (Clive Keble)	1	It is appropriate.	Comments noted
SIO620	Gladman Developments (Mat Evans)	11	It may be appropriate to set minimum densities on sites located adjacent to transport hubs, or on brownfield sites in town centre locations, however do not consider it be appropriate to set them beyond those limited circumstances. Sites have different characteristics and different development challenges to respond to, no two sites are the same. Each will require a different approach, requiring a set density for housing can have a detrimental impact on site layout and design which can again effect viability and deliverability.	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO621	AONB Partnership (Clive Keble)	2	The SAC is well covered, but the AONB less so. Reference should be made to the AONB Management Plan (2014-19 and successors).	Comments noted
SIO622	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	17	The Lichfield Centres Study is fairly recent, however, as the Plan spans the period from 2020 to 2036, it is considered that this evidence should be updated following the completion of recent retail schemes in the District. In addition, the distribution of housing growth needs first to be determined before future household expenditure can be estimated and floor space requirements determined. One the above factors have been resolved, this will then better inform the retail and office requirements.	Comments noted. This will be considered further as the Local Plan Review progresses.
SIO623	Gladman Developments (Mat Evans)	12	Lichfield will need to engage through the Duty to Cooperate with Greater Birmingham on a range of issues but principally in ensuring that the unmet housing needs are accommodated. The revised NPPF and PPG will likely require the preparation of a Memorandum of Understanding on HMA wide housing needs, setting out how needs are being met in full across the HMA. In Lichfield there will be scope to consider such unmet needs given that the current OAN may end up being reduced through the Standard Methodology. Although the current figure of 340 dpa should only be treated as indicative at this stage, and it should be remembered that this figure may still need to be increased (purely for Lichfield) to consider economic needs etc. Further work at the Greater Birmingham level will clearly be needed urgently to ensure that the Lichfield Local Plan Review can be soundly prepared having taken account of any unmet housing needs it needs to provide for.	Comments noted. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield. The Local Plan Review will consider the most appropriate Spatial Strategy and quantum for growth. This will be informed by a range of evidence.
SIO624	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	18	Producing Development Plan Documents for Lichfield City Centre and Burntwood Town Centre is not favoured, as a single comprehensive Local Plan is the preferred option. A single, comprehensive Local Plan would minimise resource and improve consistency and clarity to the local community, the development industry and investors. In addition, local planning related matters can be considered through Neighbourhood Plans. However, it is important to highlight that NDP policies may become out of date if they conflict with policies in the Local Plan Review. If changes are made to the Green Belt through the Local Plan Review those NDP policies restricting housing development in the Green Belt should be given less weight or could be updated to be consistent with the Local Plan Review.	Comments noted. This will be considered further as the Local Plan Review progresses
SIO625	Bloor Homes (Define)	3	Land interests at Shenstone Outlines the Birmingham housing shortfall position. The Local Plan Review document refers to a continued commitment to address the wider HMA needs and highlights the final distribution of unmet needs is still to be agreed. The absence of the MOU/ SOCG is a real concern as there has not been a positive outcome to the engagement the DC has undertaken with GBHMA partners to ensure that housing needs are properly identified and effectively provided for. The unmet housing need in Birmingham needs to be addressed as a priority in the review. The District Council must also positively engage with Tamworth Borough to identify and address its shortfall. The SGC only considers the level of housing need at the GBHMA level, it is essential the market and affordable housing needs arising in the District itself over the period to 2036 are identified and fully provided for in the Local Plan in accordance with the NPPF.	Comments noted, LDC will continue to engage with the GBBCHMA to seek to ensure a consistent approach is applied
SIO626	Gladman Developments (Mat Evans)	13	Self and custom build is an important aspect of house building. However, the levels of demand for it need to be carefully evidenced and a commensurate policy response developed. Does not consider policy requirements to deliver X % of a site of over X number dwellings as self-build plots are effective in delivering custom build housing, and often again have a knock on impact on the rate at which general market housing can be delivered.	Comments noted. This will be considered further as the Local Plan Review progresses and will be informed by a range of evidence.
SIO627	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	19	It is considered that the Local Plan Review offers scope to encompass a wide range of development and as well as housing, employment and retail development should include policies and strategic allocations necessary to provide appropriate leisure, recreation, infrastructure and community facilities.	Comments noted. Infrastructure provision will be considered as part of the testing of each option.
SIO628	Gladman Developments (Mat Evans)	14	Self and custom build is an important aspect of house building. However, the levels of demand for it need to be carefully evidenced and a commensurate policy response developed. Does not consider policy requirements to deliver X % of a site of over X number dwellings as self-build plots are effective in delivering custom build housing, and often again have a knock on impact on the rate at which general market housing can be delivered.	Comments noted. This will be considered further as the Local Plan Review progresses and will be informed by a range of evidence.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO629	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	20	The levels of housing, employment and retail growth should be determined before work on the IDP commences in order that the types of infrastructure required can then be established. Within Shenstone and Little Aston there are local aspirations to delivery improved social, physical and green infrastructure to support the local communities. These aspirations are set out within both of the 'made' NDPs. Touch Developments consider that further residential development focused at Watford Gap could assist in delivering the necessary infrastructure, in a timely manner, to ensure any impacts of development are mitigated and to assist in delivering the wider objectives as set out in both the Little Aston and Shenstone NDPs.	Comments noted. The inclusion of new policies will be considered as the Local Plan Review progresses. This will be informed by a range of evidence.
SIO630	Gladman Developments (Mat Evans)	21	At this stage it is difficult to assess what option would be the best solution to meeting the housing needs of Lichfield, urges the Council to keep an open mind to all of the possibilities listed within the consultation document and consider them again in detail when the housing needs of Lichfield are finalised (including any unmet needs of Birmingham). It is clear from both the Housing White Paper and the draft revised NPPF that government expects that local plans should contain a wide range of sites. These sites should both have a wide geographical spread as well as being allocations of various sizes. Whilst large allocations and SUEs have a role to play in meeting needs, they can be time consuming and challenging to deliver, this can cut the amount of small and medium scale housebuilders who have access to sites, and who can therefore contribute towards delivering housing needs. Similarly it will be important for Lichfield to consider the positives that can come from allocating proportionate development to all sustainable settlements. Often rural areas have services which are underutilised or which require additional population to make them viable. It is incumbent on the Council to bottom out its housing needs before the next round of consultation, detailed consideration can then be given to how those needs can be met, in accordance with any guidance set out in the final revised NPPF.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the consideration of the housing requirement for the area.
SIO631	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	21 & 22	Focusing the majority of growth within and around the major settlements would bring forward certain benefits, such as re-using brownfield land within urban areas, utilising infrastructure that is already in place, making best use of and supporting existing services and facilities, and building to higher densities where appropriate. This option would also allow for urban extensions to settlements just outside of the District's boundary, and would therefore be able to assist in meeting cross boundary housing needs. Option 1 identifies Little Aston/Sutton Coldfield/Birmingham as an area for consideration of town focused development through a potential sustainable urban extension. Little Aston is physically connected to Sutton Coldfield/Birmingham and has strong links to the conurbation and would be a logical location to meet arising strategic housing needs from the Greater Birmingham HMA.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO632	Bloor Homes (Define)	21	Land interests at Shenstone The Local Plan Review must facilitate a continual supply of market and affordable housing from a portfolio of deliverable development sites based on a robust and sustainable spatial development strategy with sufficient flexibility. This reflects the overarching conclusion of the SGC para 9.4 A Green Belt review will be required to release and allocate sites for development where they are best placed to address the identified housing needs and delivery can be supported through the provision of infrastructure. That portfolio approach will, however, ensure a rolling 5 year housing land supply is maintained and that the overall housing requirements are met within the plan period so that everyone actually has the opportunity of a decent home in a sustainable community and that the nation's housing crisis is addressed.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO633	Gladman Developments (Mat Evans)	22	At this stage it is difficult to assess what option would be the best solution to meeting the housing needs of Lichfield, urges the Council to keep an open mind to all of the possibilities listed within the consultation document and consider them again in detail when the housing needs of Lichfield are finalised (including any unmet needs of Birmingham). It is clear from both the Housing White Paper and the draft revised NPPF that government expects that local plans should contain a wide range of sites. These sites should both have a wide geographical spread as well as being allocations of various sizes. Whilst large allocations and SUEs have a role to play in meeting needs, they can be time consuming and challenging to deliver, this can cut the amount of small and medium scale housebuilders who have access to sites, and who can therefore contribute towards delivering housing needs. Similarly it will be important for Lichfield to consider the positives that can come from allocating proportionate development to all sustainable settlements. Often rural areas have services which are underutilised or which require additional population to make them viable. It is incumbent on the Council to bottom out its housing needs before the next round of consultation, detailed consideration can then be given to how those needs can be met, in accordance with any guidance set out in the final revised NPPF.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the consideration of the housing requirement for the area.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO634	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	23 & 24	<p>This option represents a continuation of the spatial strategy set out in the existing Local Plan. This is considered to be an appropriate option for delivering housing growth, as it would allow a greater range of sustainable sites to come forward and would increase housing choice for new and existing residents. The existing Key Rural Settlements are entirely suitable to remain. However, it is noted that there is an opportunity to update the Rural Settlement Sustainability Study to ascertain if there are any further settlements which should be added to this category. Distributing housing to these settlements would assist in maintaining their services and facilities. The Local Plan Review affords the opportunity to re-examine settlement and Green Belt boundaries. Shenstone Wood End is not currently defined by a settlement boundary in the adopted Local Plan Strategy. However, the Local Plan Review presents the District Council with an opportunity to define a settlement boundary for Shenstone Wood End, particularly given that Option 2 identifies this area as a potential other option for housing growth.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO635	Gladman Developments (Mat Evans)	23	<p>At this stage it is difficult to assess what option would be the best solution to meeting the housing needs of Lichfield, urges the Council to keep an open mind to all of the possibilities listed within the consultation document and consider them again in detail when the housing needs of Lichfield are finalised (including any unmet needs of Birmingham).</p> <p>It is clear from both the Housing White Paper and the draft revised NPPF is that government expects that local plans should contain a wide range of sites. These sites should both have a wide geographical spread as well as being allocations of various sizes. Whilst large allocations and SUEs have a role to play in meeting needs, they can be time consuming and challenging to deliver, this can cut the amount of small and medium scale housebuilders who have access to sites, and who can therefore contribute towards delivering housing needs. Similarly it will be important for Lichfield to consider the positives that can come from allocating proportionate development to all sustainable settlements. Often rural areas have services which are underutilised or which require additional population to make them viable.</p> <p>It is incumbent on the Council to bottom out its housing needs before the next round of consultation, detailed consideration can then be given to how those needs can be met, in accordance with any guidance set out in the final revised NPPF.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the consideration of the housing requirement for the area.
SIO636	Gladman Developments (Mat Evans)	24	<p>At this stage it is difficult to assess what option would be the best solution to meeting the housing needs of Lichfield, urges the Council to keep an open mind to all of the possibilities listed within the consultation document and consider them again in detail when the housing needs of Lichfield are finalised (including any unmet needs of Birmingham).</p> <p>It is clear from both the Housing White Paper and the draft revised NPPF is that government expects that local plans should contain a wide range of sites. These sites should both have a wide geographical spread as well as being allocations of various sizes. Whilst large allocations and SUEs have a role to play in meeting needs, they can be time consuming and challenging to deliver, this can cut the amount of small and medium scale housebuilders who have access to sites, and who can therefore contribute towards delivering housing needs. Similarly it will be important for Lichfield to consider the positives that can come from allocating proportionate development to all sustainable settlements. Often rural areas have services which are underutilised or which require additional population to make them viable.</p> <p>It is incumbent on the Council to bottom out its housing needs before the next round of consultation, detailed consideration can then be given to how those needs can be met, in accordance with any guidance set out in the final revised NPPF.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the consideration of the housing requirement for the area.
SIO637	Gladman Developments (Mat Evans)	25	<p>At this stage it is difficult to assess what option would be the best solution to meeting the housing needs of Lichfield, urges the Council to keep an open mind to all of the possibilities listed within the consultation document and consider them again in detail when the housing needs of Lichfield are finalised (including any unmet needs of Birmingham).</p> <p>It is clear from both the Housing White Paper and the draft revised NPPF is that government expects that local plans should contain a wide range of sites. These sites should both have a wide geographical spread as well as being allocations of various sizes. Whilst large allocations and SUEs have a role to play in meeting needs, they can be time consuming and challenging to deliver, this can cut the amount of small and medium scale housebuilders who have access to sites, and who can therefore contribute towards delivering housing needs. Similarly it will be important for Lichfield to consider the positives that can come from allocating proportionate development to all sustainable settlements. Often rural areas have services which are underutilised or which require additional population to make them viable.</p> <p>It is incumbent on the Council to bottom out its housing needs before the next round of consultation, detailed consideration can then be given to how those needs can be met, in accordance with any guidance set out in the final revised NPPF.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the consideration of the housing requirement for the area.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO638	Gladman Developments (Mat Evans)	26	<p>At this stage it is difficult to assess what option would be the best solution to meeting the housing needs of Lichfield, urges the Council to keep an open mind to all of the possibilities listed within the consultation document and consider them again in detail when the housing needs of Lichfield are finalised (including any unmet needs of Birmingham).</p> <p>It is clear from both the Housing White Paper and the draft revised NPPF is that government expects that local plans should contain a wide range of sites. These sites should both have a wide geographical spread as well as being allocations of various sizes. Whilst large allocations and SUEs have a role to play in meeting needs, they can be time consuming and challenging to deliver, this can cut the amount of small and medium scale housebuilders who have access to sites, and who can therefore contribute towards delivering housing needs. Similarly it will be important for Lichfield to consider the positives that can come from allocating proportionate development to all sustainable settlements. Often rural areas have services which are underutilised or which require additional population to make them viable.</p> <p>It is incumbent on the Council to bottom out its housing needs before the next round of consultation, detailed consideration can then be given to how those needs can be met, in accordance with any guidance set out in the final revised NPPF.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the consideration of the housing requirement for the area.
SIO639	AONB Partnership (Clive Keble)	3	The AONB is a key strategic cross boundary issue, requiring joint working and a consistent approach involving 4 districts and the County Council. The established AONB Partnership is a good mechanism to use to achieve this aim.	Comments noted LDC will continue to engage in the AONB partnership
SIO640	Gladman Developments (Mat Evans)	27	<p>At this stage it is difficult to assess what option would be the best solution to meeting the housing needs of Lichfield, urges the Council to keep an open mind to all of the possibilities listed within the consultation document and consider them again in detail when the housing needs of Lichfield are finalised (including any unmet needs of Birmingham).</p> <p>It is clear from both the Housing White Paper and the draft revised NPPF is that government expects that local plans should contain a wide range of sites. These sites should both have a wide geographical spread as well as being allocations of various sizes. Whilst large allocations and SUEs have a role to play in meeting needs, they can be time consuming and challenging to deliver, this can cut the amount of small and medium scale housebuilders who have access to sites, and who can therefore contribute towards delivering housing needs. Similarly it will be important for Lichfield to consider the positives that can come from allocating proportionate development to all sustainable settlements. Often rural areas have services which are underutilised or which require additional population to make them viable.</p> <p>It is incumbent on the Council to bottom out its housing needs before the next round of consultation, detailed consideration can then be given to how those needs can be met, in accordance with any guidance set out in the final revised NPPF.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the consideration of the housing requirement for the area.
SIO641	AONB Partnership (Clive Keble)	4	Agreed, in particular the retention of an AONB specific policy based on Policy NR10 of the Local Plan Allocations (Focused Changes) Document (May 2018 Submission Version).	Comments noted
SIO642	Gladman Developments (Mat Evans)	28	<p>At this stage it is difficult to assess what option would be the best solution to meeting the housing needs of Lichfield, urges the Council to keep an open mind to all of the possibilities listed within the consultation document and consider them again in detail when the housing needs of Lichfield are finalised (including any unmet needs of Birmingham).</p> <p>It is clear from both the Housing White Paper and the draft revised NPPF is that government expects that local plans should contain a wide range of sites. These sites should both have a wide geographical spread as well as being allocations of various sizes. Whilst large allocations and SUEs have a role to play in meeting needs, they can be time consuming and challenging to deliver, this can cut the amount of small and medium scale housebuilders who have access to sites, and who can therefore contribute towards delivering housing needs. Similarly it will be important for Lichfield to consider the positives that can come from allocating proportionate development to all sustainable settlements. Often rural areas have services which are underutilised or which require additional population to make them viable.</p> <p>It is incumbent on the Council to bottom out its housing needs before the next round of consultation, detailed consideration can then be given to how those needs can be met, in accordance with any guidance set out in the final revised NPPF.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the consideration of the housing requirement for the area.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO643	Gladman Developments (Mat Evans)	29	<p>At this stage it is difficult to assess what option would be the best solution to meeting the housing needs of Lichfield, urges the Council to keep an open mind to all of the possibilities listed within the consultation document and consider them again in detail when the housing needs of Lichfield are finalised (including any unmet needs of Birmingham).</p> <p>It is clear from both the Housing White Paper and the draft revised NPPF is that government expects that local plans should contain a wide range of sites. These sites should both have a wide geographical spread as well as being allocations of various sizes. Whilst large allocations and SUEs have a role to play in meeting needs, they can be time consuming and challenging to deliver, this can cut the amount of small and medium scale housebuilders who have access to sites, and who can therefore contribute towards delivering housing needs. Similarly it will be important for Lichfield to consider the positives that can come from allocating proportionate development to all sustainable settlements. Often rural areas have services which are underutilised or which require additional population to make them viable.</p> <p>It is incumbent on the Council to bottom out its housing needs before the next round of consultation, detailed consideration can then be given to how those needs can be met, in accordance with any guidance set out in the final revised NPPF.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the consideration of the housing requirement for the area.
SIO644	Bloor Homes (Define)	22	<p>Land interests at Shenstone</p> <p>The Local Plan Review must facilitate a continual supply of market and affordable housing from a portfolio of deliverable development sites based on a robust and sustainable spatial development strategy with sufficient flexibility. This reflects the overarching conclusion of the SGC para 9.4</p> <p>A Green Belt review will be required to release and allocate sites for development where they are best placed to address the identified housing needs and delivery can be supported through the provision of infrastructure.</p> <p>That portfolio approach will, however, ensure a rolling 5 year housing land supply is maintained and that the overall housing requirements are met within the plan period so that everyone actually has the opportunity of a decent home in a sustainable community and that the nation's housing crisis is addressed.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO645	Gladman Developments (Mat Evans)	30	<p>At this stage it is difficult to assess what option would be the best solution to meeting the housing needs of Lichfield, urges the Council to keep an open mind to all of the possibilities listed within the consultation document and consider them again in detail when the housing needs of Lichfield are finalised (including any unmet needs of Birmingham).</p> <p>It is clear from both the Housing White Paper and the draft revised NPPF is that government expects that local plans should contain a wide range of sites. These sites should both have a wide geographical spread as well as being allocations of various sizes. Whilst large allocations and SUEs have a role to play in meeting needs, they can be time consuming and challenging to deliver, this can cut the amount of small and medium scale housebuilders who have access to sites, and who can therefore contribute towards delivering housing needs. Similarly it will be important for Lichfield to consider the positives that can come from allocating proportionate development to all sustainable settlements. Often rural areas have services which are underutilised or which require additional population to make them viable.</p> <p>It is incumbent on the Council to bottom out its housing needs before the next round of consultation, detailed consideration can then be given to how those needs can be met, in accordance with any guidance set out in the final revised NPPF.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the consideration of the housing requirement for the area.
SIO646	AONB Partnership (Clive Keble)	5	As question 4. Agreed, in particular the retention of an AONB specific policy based on Policy NR10 of the Local Plan Allocations (Focused Changes) Document (May 2018 Submission Version).	Comments noted
SIO647	Bloor Homes (Define)	12	<p>Land interests at Shenstone</p> <p>Outlines the Birmingham housing shortfall position. The Local Plan Review document refers to a continued commitment to address the wider HMA needs and highlights the final distribution of unmet needs is still to be agreed. The absence of the MOU/ SOCG is a real concern as there has not been a positive outcome to the engagement the DC has undertaken with GBHMA partners to ensure that housing needs are properly identified and effectively provided for. The unmet housing need in Birmingham needs to be addressed as a priority in the review.</p> <p>The District Council must also positively engage with Tamworth Borough to identify and address its shortfall.</p> <p>The SGC only considers the level of housing need at the GBHMA level, it is essential the market and affordable housing needs arising in the District itself over the period to 2036 are identified and fully provided for in the Local Plan in accordance with the NPPF.</p>	Comments noted. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield. The Local Plan Review will consider the most appropriate Spatial Strategy and quantum for growth. This will be informed by a range of evidence.
SIO648	AONB Partnership (Clive Keble)	6	Agree	Comments noted

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO649	Gladman Developments (Mat Evans)	31	A firm indication on what the employment needs of Lichfield will be, will to some extent, inform the size and location of employment allocations. Again these levels may be influenced by unmet need from elsewhere. However, with regard employment land, particularly for large strategic sites, the market may dictate where it wants to deliver such development. Uses such as B2/B8 in particular are extremely sensitive to location, largely related to strategic transport routes. Requests that the Council consider the need to identify employment land around strategic infrastructure points, such as the M6 toll or the A5.	The Council would need to change its strategy of expanding existing employment areas to one of development around strategic transport nodes explicitly.
SIO650	AONB Partnership (Clive Keble)	7	Although it is covered in part by the AONB specific policy (NR10 of the Site Allocations Document) equine related development could be considered in greater detail.	Comments noted, this will be considered
SIO651	Bloor Homes (Define)	2	Land interests at Shenstone Keep the housing need evidence base for both the District and wider HMA up to date throughout the plan making process Consider the wider opportunities for strategic growth, notably at Shenstone, including a review of the Green Belt in the District. Assess the future development needs of specific rural settlements required to meet local market and affordable housing need Review HLAA Provide an evidenced assessment of deliverability and anticipated rate of delivery of key existing and proposed development schemes required to address identified housing need Develop a robust IDP that co-ordinates, facilitates and supports the delivery of the required development and supporting infrastructure Undertake a cumulative viability assessment of the Local Plan proposals and requirements.	Consideration to undertaking a HEDNA will be undertaken Comments noted, consideration of a Green Belt Review will be undertaken Comments noted viability evidence will be considered
SIO652	AONB Partnership (Clive Keble)	8	The list is comprehensive, but Issue No. 13 could be expanded to read as follows: "Protect and promote landscapes and the natural environment."	Comments noted - consideration of expanding the issue will be considered
SIO653	Gladman Developments (Mat Evans)	32	A firm indication on what the employment needs of Lichfield will be, will to some extent, inform the size and location of employment allocations. Again these levels may be influenced by unmet need from elsewhere. However, with regard employment land, particularly for large strategic sites, the market may dictate where it wants to deliver such development. Uses such as B2/B8 in particular are extremely sensitive to location, largely related to strategic transport routes. Requests that the Council consider the need to identify employment land around strategic infrastructure points, such as the M6 toll or the A5.	see response to reference SIO649
SIO654	Gladman Developments (Mat Evans)	33	A firm indication on what the employment needs of Lichfield will be, will to some extent, inform the size and location of employment allocations. Again these levels may be influenced by unmet need from elsewhere. However, with regard employment land, particularly for large strategic sites, the market may dictate where it wants to deliver such development. Uses such as B2/B8 in particular are extremely sensitive to location, largely related to strategic transport routes. Requests that the Council consider the need to identify employment land around strategic infrastructure points, such as the M6 toll or the A5.	See response to representation SIO649
SIO655	AONB Partnership (Clive Keble)	9	Agreed, it remains relevant.	Comments noted
SIO656	AONB Partnership (Clive Keble)	10	The list is relevant, but SO12 could be expanded with a clause added to read: "...Green Belt and the landscape and scenic beauty of the AONB."	Comments noted this can be considered
SIO657	AONB Partnership (Clive Keble)	11	It is assumed that it may not directly affect the AONB, but any such policy would need to be carefully worded. It should not, as an unintended consequence, create a policy justification for inappropriate higher density development in the AONB/Green Belt villages of Gentleshaw and Upper Longdon.	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO658	AONB Partnership (Clive Keble)	12	No, not at expense of the landscape, scenic beauty and openness of the AONB/Green Belt in Lichfield District.	Comments noted
SIO659	AONB Partnership (Clive Keble)	13	This is acceptable provided that it does not increase pressure for new housing within and adjoining the AONB.	Comments noted.
SIO660	AONB Partnership (Clive Keble)	15	Alternatives may be acceptable, but this should not increase pressure for new housing within and adjoining the AONB.	Comments noted.
SIO661	AONB Partnership (Clive Keble)	17	Agreed.	Comment noted
SIO662	AONB Partnership (Clive Keble)	18	An SPD on equine related developments would help to protect the landscape and is justified by the level of demand for/impact arising from proposals in and around the AONB (e.g. around Gentleshaw and Upper Longdon).	Comments noted.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO663	AONB Partnership (Clive Keble)	19	An SPD on equine related developments would help to protect the landscape and is justified by the level of demand for/impact arising from proposals in and around the AONB (e.g. around Gentleshaw and Upper Longdon). Plus equine related development and possibly, solar farms.	Comments noted
SIO664	AONB Partnership (Clive Keble)	20	Non-vehicular access to the countryside (walking, cycling and riding) and sensitive land/habitat management can support wider sustainable development and helps to achieve AONB objectives.	Comments noted
SIO665	AONB Partnership (Clive Keble)	21	In general, yes, but care is needed for settlements such as Burntwood which adjoin the AONB where large scale development in the setting of the AONB can have an adverse impact on views into and out of the designated area.	Comments noted.
SIO666	AONB Partnership (Clive Keble)	22	In general, yes, but care is needed for settlements such as Burntwood which adjoin the AONB where large scale development in the setting of the AONB can have an adverse impact on views into and out of the designated area and the consideration of the impact of any amendments to the Green Belt around Burntwood should include the impact on the AONB (and Gentleshaw Common SSSI).	Comments noted.
SIO667	AONB Partnership (Clive Keble)	23	In general, yes, but care is needed for settlements such as Burntwood which adjoin the AONB where large scale development in the setting of the AONB can have an adverse impact on views into and out of the designated area.	Comments noted.
SIO668	AONB Partnership (Clive Keble)	26	Any changes to the settlement boundary for Upper Longdon should be considered very carefully in terms of the potential for a substantial adverse impact on the AONB (and the SAC). A settlement boundary should not be considered for Gentleshaw.	Comments noted.
SIO669	AONB Partnership (Clive Keble)	30	A well planned, sustainably developed new settlement, could reduce pressure on the countryside, including the AONB, but it is not appropriate for the AONB Partnership to promote any particular locations for new settlements.	Comment noted.
SIO670	AONB Partnership (Clive Keble)	31	In general, yes, but care is needed for settlements such as Burntwood which adjoin the AONB where large scale development in the setting of the AONB can have an adverse impact on views into and out of the designated area. Therefore, any proposed sites should reflect existing land use patterns, with development to the west and south of the existing settlement.	Comments noted; development management would make decisions which reflect this constraint.
SIO671	AONB Partnership (Clive Keble)	34	None are within or close to the AONB and they seem reasonable options to explore.	Comments noted.
SIO672	AONB Partnership (Clive Keble)	38	Yes, this seems appropriate.	Comments noted
SIO673	AONB Partnership (Clive Keble)	39	Yes, this seems appropriate.	Comments noted
SIO674	AONB Partnership (Clive Keble)	40	Again, this seems appropriate, however, as infrastructure ideas are developed there is a need to distinguish between the site specific Special Area of Conservation and the wider AONB. The SAC does not include all the AONB and is habitat focused without a wider coverage of landscape, scenic beauty and quiet enjoyment. It is possible, if they are not carefully considered, that SAC mitigation measures could adversely affect the AONB and consultation will be required on projects. The continued inclusion of a section on the AONB/SAC would be welcomed, but it may be desirable to separate AONB and SAC interests, with specific projects identified for each. It is also important that the deployment of CIL linked to the development east of Rugeley and at Burntwood, recognises the need to protect and enhance the AONB and takes opportunities to improve sustainable access to it.	Comments noted: this will be safeguarded through policy.
SIO675	AONB Partnership (Clive Keble)	41	See Q2, the SAC is well covered, but the AONB less so and reference should be made to the AONB Management Plan (2014-19 and successors).	Comments noted: this will be safeguarded through policy.
SIO676	AONB Partnership (Clive Keble)	42	The AONB Management Plan 2014-2019 and successors) will be relevant.	Comments noted
SIO677	AONB Partnership (Clive Keble)	43	Agreed, but see response to Q3 (strategic cross boundary issues). Joint working by the four districts and the County Council occurs and the established AONB Partnership should be engaged in the IDP process.	Comments noted: The District Council is committed to working in cooperation with neighbouring authorities to ensure appropriate infrastructure response.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO678	Bloor Homes (Define)	23	<p>Land interests at Shenstone</p> <p>Spatial Strategy The Local Plan Review must facilitate a continual supply of market and affordable housing from a portfolio of deliverable development sites based on a robust and sustainable spatial development strategy with sufficient flexibility. This reflects the overarching conclusion of the SGC para 9.4</p> <p>A Green Belt review will be required to release and allocate sites for development where they are best placed to address the identified housing needs and delivery can be supported through the provision of infrastructure.</p> <p>That portfolio approach will, however, ensure a rolling 5 year housing land supply is maintained and that the overall housing requirements are met within the plan period so that everyone actually has the opportunity of a decent home in a sustainable community and that the nation's housing crisis is addressed.</p> <p>Shenstone Option 4 reflects the findings of the SGC. Confirms Bloor Homes are working with the major landowners to the area to the east of village to explore the potential for the delivery of a major urban extension that could form a fundamental element of a 'New Settlement.'</p> <p>Submits a Concept Masterplan to demonstrate the capacity for development and its deliverability. Confirms there is no insurmountable technical or environmental constraints. Whilst the land is in Green Belt the overall sustainability and deliverability must be the determinative considerations. Suggests the site could deliver circa 1000 dwellings together with community facilities including a Primary School and sports pitches and 4.76ha of employment land. Opportunity to deliver a relief road to Shenstone that would provide significant local highway network improvements and a strategic connection to the A5. Bloor Homes strongly supports the identification and consideration of a new settlement / SUE at Shenstone.</p> <p>Key Rural Settlement The LPR should positively address the NPPF policy imperative to support thriving rural communities. The spatial development strategy must address the reaffirmed national policy. That is not to say Option 3 would be supported per se but the Council must ensure that development needs of rural communities in the District are positively addressed over the plan period and the on-going role and function of rural towns and villages, particularly key rural settlements are supported as a key part of any future spatial development strategy (akin to Option 2). It is essential those communities continue to thrive and do not stagnate or go into decline.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO679	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	26 & 27	<p>Those settlements listed with identified settlement boundaries represent the most sustainable settlements within the District. A comprehensive Green Belt Review is welcomed. Consideration of other smaller settlements and hamlets through a the Review should extend to all other Green Belt settlements listed under Options 1 and 2. Although this option would have the advantage of meeting housing needs where they arise and support village services and facilities, in isolation it would represent the least sustainable option for growth. In light of the findings of the Strategic Green Belt Review, Option 3 considers 'infill boundaries' to those settlements located within the Green Belt to allow for limited growth of those settlements. If an infill boundary for Shenstone Wood End were to be defined, it would be logical to include the site(s) promoted through this representation. Whilst the definition of a settlement boundary for Shenstone Wood End is supported this should not be limited to the existing extent of built form given there is an opportunity now for this location, which is entirely logical and suitable to assist meet strategic housing needs. Options 2 and 3 should work together in directing development towards Shenstone Wood End.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO680	Nick Misselke (Acquireland)	1	<p>Yes the plan period of 2020-2036 is appropriate.</p>	Comments noted
SIO681	Nick Misselke (Acquireland)	7	<p>A specific policy should be included in the Plan Review which relates to self-build and Custom Built Development. This would ensure that the Development Plan is in conformity with paragraph 50 of the NPPF which makes it clear that Local Planning Authorities should identify and make provision for the housing 'needs of different groups in the community such as, people wishing to build their own homes'. Such a policy would contribute to the availability of self and custom build sites/plots enabling local residents to develop high quality homes as well as supporting the local economy.</p>	The Council will give these matters consideration as part of the review, in particular focusing on the requirements arising from the NPPF and NPPG.
SIO682	Natural England (Antony Muller)	1	<p>We agree with the approach described here.</p>	Comments noted

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO683	Nick Misselke (Acquireland)	13	<p>To support prospective self and custom builders in the District, serviced sites should be allocated in the Local Plan. The policy would help residents develop their own lower cost market housing, support the local economy by providing work for local builders and traders, increase the diversity of housing supply and encourage sustainable construction methods.</p> <p>Land at Fosseyway (SHLAA reference 633) is available for allocation as a self-build/custom build site. The site is in a sustainable location, close to public transport and within walking distance of services and facilities and Lichfield Town Centre.</p>	Comments noted. This will be considered further as the Local Plan Review progresses and will be informed by a range of evidence.
SIO684	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	28 & 30	<p>Touch Developments broadly concurs with the challenges and opportunities identified. However, the option of a new settlement was considered previously by the District Council in developing the current Local Plan Strategy and determined that the challenges outweighed the opportunities. A new settlement is not considered to be an appropriate solution in isolation due to the need for significant new infrastructure and long lead in times. Option 4 should not be progressed in isolation to meet the housing needs of Lichfield District and the wider HMA.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO685	Natural England (Antony Muller)	2	<p>We generally agree with the commentary set out in appendix A but offer the following comments on some of the detail:</p> <p>European sites General comment – Conservation objectives for European Sites are subject to review and the updated documents including ‘supplementary advice packages’ are available. Case law - Cannock Chase SAC – Appendix B refers to the Wealden Judgement¹ with specific respect to this SAC. We welcome the acknowledgment of this ruling but given its relevance to ‘in combination assessment’ as part of HRA in general we would encourage the Council to consider the implications of the ruling to any European Sites being considered as part of the HRA work for the local plan review.</p> <p>We would also draw the Council’s attention to the following rulings in relation to European Sites and HRA: ‘Moorburg’ (Theme - Unregulated activities and historic consents, their influence on European Site condition and consideration during HRA of plans and projects.) and ‘Sweetman2’ (Theme – Approach to the consideration of mitigation measures during the HRA stage one ‘screening’ process)</p>	<p>Comments noted evidence on the SAC will be considered.</p> <p>HRA will need to be undertaken at each stage of the Plan</p>
SIO686	Nick Misselke (Acquireland)	23	<p>Yes.</p>	Comment noted.
SIO687	Bloor Homes (Define)	24	<p>Land interests at Shenstone</p> <p>Spatial Strategy The Local Plan Review must facilitate a continual supply of market and affordable housing from a portfolio of deliverable development sites based on a robust and sustainable spatial development strategy with sufficient flexibility. This reflects the overarching conclusion of the SGC para 9.4</p> <p>A Green Belt review will be required to release and allocate sites for development where they are best placed to address the identified housing needs and delivery can be supported through the provision of infrastructure.</p> <p>That portfolio approach will, however, ensure a rolling 5 year housing land supply is maintained and that the overall housing requirements are met within the plan period so that everyone actually has the opportunity of a decent home in a sustainable community and that the nation’s housing crisis is addressed.</p> <p>Shenstone Option 4 reflects the findings of the SGC. Confirms Bloor Homes are working with the major landowners to the area to the east of village to explore the potential for the delivery of a major urban extension that could form a fundamental element of a ‘New Settlement.’</p> <p>Submits a Concept Masterplan to demonstrate the capacity for development and its deliverability. Confirms there is no insurmountable technical or environmental constraints. Whilst the land is in Green Belt the overall sustainability and deliverability must be the determinative considerations. Suggests the site could deliver circa 1000 dwellings together with community facilities including a Primary School and sports pitches and 4.76ha of employment land. Opportunity to deliver a relief road to Shenstone that would provide significant local highway network improvements and a strategic connection to the A5. Bloor Homes strongly supports the identification and consideration of a new settlement / SUE at Shenstone.</p> <p>Key Rural Settlement The LPR should positively address the NPPF policy imperative to support thriving rural communities. The spatial development strategy must address the reaffirmed national policy. That is not to say Option 3 would be supported per se but the Council must ensure that development needs of rural communities in the District are positively addressed over the plan period and the ongoing role and function of rural towns and villages, particularly key rural settlements are supported as a key part of any future spatial development strategy (akin to Option 2). It is essential those communities continue to thrive and do not stagnate or go into decline.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.

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SIO688	Bloor Homes (Define)	25	<p>Land interests at Shenstone</p> <p>Spatial Strategy The Local Plan Review must facilitate a continual supply of market and affordable housing from a portfolio of deliverable development sites based on a robust and sustainable spatial development strategy with sufficient flexibility. This reflects the overarching conclusion of the SGC para 9.4</p> <p>A Green Belt review will be required to release and allocate sites for development where they are best placed to address the identified housing needs and delivery can be supported through the provision of infrastructure.</p> <p>That portfolio approach will, however, ensure a rolling 5 year housing land supply is maintained and that the overall housing requirements are met within the plan period so that everyone actually has the opportunity of a decent home in a sustainable community and that the nation's housing crisis is addressed.</p> <p>Shenstone Option 4 reflects the findings of the SGC. Confirms Bloor Homes are working with the major landowners to the area to the east of village to explore the potential for the delivery of a major urban extension that could form a fundamental element of a 'New Settlement.'</p> <p>Submits a Concept Masterplan to demonstrate the capacity for development and its deliverability. Confirms there is no insurmountable technical or environmental constraints. Whilst the land is in Green Belt the overall sustainability and deliverability must be the determinative considerations. Suggests the site could deliver circa 1000 dwellings together with community facilities including a Primary School and sports pitches and 4.76ha of employment land. Opportunity to deliver a relief road to Shenstone that would provide significant local highway network improvements and a strategic connection to the A5. Bloor Homes strongly supports the identification and consideration of a new settlement / SUE at Shenstone.</p> <p>Key Rural Settlement The LPR should positively address the NPPF policy imperative to support thriving rural communities. The spatial development strategy must address the reaffirmed national policy. That is not to say Option 3 would be supported per se but the Council must ensure that development needs of rural communities in the District are positively addressed over the plan period and the on-going role and function of rural towns and villages, particularly key rural settlements are supported as a key part of any future spatial development strategy (akin to Option 2). It is essential those communities continue to thrive and do not stagnate or go into decline.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO689	Stuart Wells (Pegasus) on behalf of Touch Developments Ltd	37	<p>The spatial strategy needs to be consistent with the vision and the strategic priorities. In retaining the vision and approach set out in the Local Plan it therefore follows that the spatial strategy should continue to focus growth on the main centres and key settlements. Additionally, the strategy should encompass provision for cross boundary needs, which may result in other strategic locations being identified. It is therefore considered that the preferred option should therefore be a combination of Options 1 and 2, as well as including some elements of Option 3.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

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SIO690	Bloor Homes (Define)	26	<p>Land interests at Shenstone</p> <p>Spatial Strategy The Local Plan Review must facilitate a continual supply of market and affordable housing from a portfolio of deliverable development sites based on a robust and sustainable spatial development strategy with sufficient flexibility. This reflects the overarching conclusion of the SGC para 9.4</p> <p>A Green Belt review will be required to release and allocate sites for development where they are best placed to address the identified housing needs and delivery can be supported through the provision of infrastructure.</p> <p>That portfolio approach will, however, ensure a rolling 5 year housing land supply is maintained and that the overall housing requirements are met within the plan period so that everyone actually has the opportunity of a decent home in a sustainable community and that the nation's housing crisis is addressed.</p> <p>Shenstone Option 4 reflects the findings of the SGC. Confirms Bloor Homes are working with the major landowners to the area to the east of village to explore the potential for the delivery of a major urban extension that could form a fundamental element of a 'New Settlement.'</p> <p>Submits a Concept Masterplan to demonstrate the capacity for development and its deliverability. Confirms there is no insurmountable technical or environmental constraints. Whilst the land is in Green Belt the overall sustainability and deliverability must be the determinative considerations. Suggests the site could deliver circa 1000 dwellings together with community facilities including a Primary School and sports pitches and 4.76ha of employment land. Opportunity to deliver a relief road to Shenstone that would provide significant local highway network improvements and a strategic connection to the A5. Bloor Homes strongly supports the identification and consideration of a new settlement / SUE at Shenstone.</p> <p>Key Rural Settlement The LPR should positively address the NPPF policy imperative to support thriving rural communities. The spatial development strategy must address the reaffirmed national policy. That is not to say Option 3 would be supported per se but the Council must ensure that development needs of rural communities in the District are positively addressed over the plan period and the ongoing role and function of rural towns and villages, particularly key rural settlements are supported as a key part of any future spatial development strategy (akin to Option 2). It is essential those communities continue to thrive and do not stagnate or go into decline.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO691	Natural England (Antony Muller)	3	<p>Issues? Air quality – Wealden judgement and assessment of 'in combination' effects. (ii) Mechanisms to address? Dialogue with neighbouring LPAs in respect of plans and projects which in combination may have significant effects on European Sites in the area. Scope may exist to explore the need for and application of Shared Nitrogen Action Plans (SNAPs). Atmospheric nitrogen 'theme plan'</p>	Comments noted, consideration with other Authorities on this matter is required

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SIO692	Bloor Homes (Define)	27	<p>Land interests at Shenstone</p> <p>Spatial Strategy The Local Plan Review must facilitate a continual supply of market and affordable housing from a portfolio of deliverable development sites based on a robust and sustainable spatial development strategy with sufficient flexibility. This reflects the overarching conclusion of the SGC para 9.4</p> <p>A Green Belt review will be required to release and allocate sites for development where they are best placed to address the identified housing needs and delivery can be supported through the provision of infrastructure.</p> <p>That portfolio approach will, however, ensure a rolling 5 year housing land supply is maintained and that the overall housing requirements are met within the plan period so that everyone actually has the opportunity of a decent home in a sustainable community and that the nation's housing crisis is addressed.</p> <p>Shenstone Option 4 reflects the findings of the SGC. Confirms Bloor Homes are working with the major landowners to the area to the east of village to explore the potential for the delivery of a major urban extension that could form a fundamental element of a 'New Settlement.'</p> <p>Submits a Concept Masterplan to demonstrate the capacity for development and its deliverability. Confirms there is no insurmountable technical or environmental constraints. Whilst the land is in Green Belt the overall sustainability and deliverability must be the determinative considerations. Suggests the site could deliver circa 1000 dwellings together with community facilities including a Primary School and sports pitches and 4.76ha of employment land. Opportunity to deliver a relief road to Shenstone that would provide significant local highway network improvements and a strategic connection to the A5. Bloor Homes strongly supports the identification and consideration of a new settlement / SUE at Shenstone.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO693	Bloor Homes (Define)	28	<p>Land interests at Shenstone</p> <p>Spatial Strategy The Local Plan Review must facilitate a continual supply of market and affordable housing from a portfolio of deliverable development sites based on a robust and sustainable spatial development strategy with sufficient flexibility. This reflects the overarching conclusion of the SGC para 9.4</p> <p>A Green Belt review will be required to release and allocate sites for development where they are best placed to address the identified housing needs and delivery can be supported through the provision of infrastructure.</p> <p>That portfolio approach will, however, ensure a rolling 5 year housing land supply is maintained and that the overall housing requirements are met within the plan period so that everyone actually has the opportunity of a decent home in a sustainable community and that the nation's housing crisis is addressed.</p> <p>Shenstone Option 4 reflects the findings of the SGC. Confirms Bloor Homes are working with the major landowners to the area to the east of village to explore the potential for the delivery of a major urban extension that could form a fundamental element of a 'New Settlement.'</p> <p>Submits a Concept Masterplan to demonstrate the capacity for development and its deliverability. Confirms there is no insurmountable technical or environmental constraints. Whilst the land is in Green Belt the overall sustainability and deliverability must be the determinative considerations. Suggests the site could deliver circa 1000 dwellings together with community facilities including a Primary School and sports pitches and 4.76ha of employment land. Opportunity to deliver a relief road to Shenstone that would provide significant local highway network improvements and a strategic connection to the A5. Bloor Homes strongly supports the identification and consideration of a new settlement / SUE at Shenstone.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.

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SIO694	Bloor Homes (Define)	29	<p>Land interests at Shenstone</p> <p>Spatial Strategy The Local Plan Review must facilitate a continual supply of market and affordable housing from a portfolio of deliverable development sites based on a robust and sustainable spatial development strategy with sufficient flexibility. This reflects the overarching conclusion of the SGC para 9.4</p> <p>A Green Belt review will be required to release and allocate sites for development where they are best placed to address the identified housing needs and delivery can be supported through the provision of infrastructure.</p> <p>That portfolio approach will, however, ensure a rolling 5 year housing land supply is maintained and that the overall housing requirements are met within the plan period so that everyone actually has the opportunity of a decent home in a sustainable community and that the nation's housing crisis is addressed.</p> <p>Shenstone Option 4 reflects the findings of the SGC. Confirms Bloor Homes are working with the major landowners to the area to the east of village to explore the potential for the delivery of a major urban extension that could form a fundamental element of a 'New Settlement.'</p> <p>Submits a Concept Masterplan to demonstrate the capacity for development and its deliverability. Confirms there is no insurmountable technical or environmental constraints. Whilst the land is in Green Belt the overall sustainability and deliverability must be the determinative considerations. Suggests the site could deliver circa 1000 dwellings together with community facilities including a Primary School and sports pitches and 4.76ha of employment land. Opportunity to deliver a relief road to Shenstone that would provide significant local highway network improvements and a strategic connection to the A5. Bloor Homes strongly supports the identification and consideration of a new settlement / SUE at Shenstone.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO695	Bloor Homes (Define)	30	<p>Land interests at Shenstone</p> <p>Spatial Strategy The Local Plan Review must facilitate a continual supply of market and affordable housing from a portfolio of deliverable development sites based on a robust and sustainable spatial development strategy with sufficient flexibility. This reflects the overarching conclusion of the SGC para 9.4</p> <p>A Green Belt review will be required to release and allocate sites for development where they are best placed to address the identified housing needs and delivery can be supported through the provision of infrastructure.</p> <p>That portfolio approach will, however, ensure a rolling 5 year housing land supply is maintained and that the overall housing requirements are met within the plan period so that everyone actually has the opportunity of a decent home in a sustainable community and that the nation's housing crisis is addressed.</p> <p>Shenstone Option 4 reflects the findings of the SGC. Confirms Bloor Homes are working with the major landowners to the area to the east of village to explore the potential for the delivery of a major urban extension that could form a fundamental element of a 'New Settlement.'</p> <p>Submits a Concept Masterplan to demonstrate the capacity for development and its deliverability. Confirms there is no insurmountable technical or environmental constraints. Whilst the land is in Green Belt the overall sustainability and deliverability must be the determinative considerations. Suggests the site could deliver circa 1000 dwellings together with community facilities including a Primary School and sports pitches and 4.76ha of employment land. Opportunity to deliver a relief road to Shenstone that would provide significant local highway network improvements and a strategic connection to the A5. Bloor Homes strongly supports the identification and consideration of a new settlement / SUE at Shenstone.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO696	Natural England (Antony Muller)	4	Agree (for those policies within/affecting our remit)	Comments noted.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO697	Highways England (David Pyner)	2	<p>Currently available transport evidence is out of date and no longer fit for purpose. Agrees that the transport elements of the evidence base need to be reviewed as part of the LPR, particularly to take into account the preferred growth strategy once this is confirmed.</p> <p>Highways England made comments on the LPA Focused Changes document in February 2018 and stated "the current allocations are not supported by a robust transport evidence base, such that there remains some uncertainty around the scope and cost of necessary transport infrastructure to deliver the identified site allocations and how this will be delivered". Highways England's view remains valid.</p>	Transport evidence will be required to inform the Local Plan Review
SIO698	Natural England (Antony Muller)	7	<p>While we do not anticipate the need for new policies at this time we are conscious of the recent consultation on revisions to the NPPF and, separately, on Planning obligations in the planning system. We enclose a summary of our responses to these consultations for your information.</p> <p>Copy – NPPF review response – Please refer to Annex B Copy – Planning obligations consultation response – Please refer to Annex C</p>	Comments noted.
SIO699	Natural England (Antony Muller)	8	<p>Implications for the assessment of 'in combination' effects upon European sites under the Habitats Regulations 2017, especially given the Wealdon judgement which may entail further cross border working with neighbouring planning authorities and stakeholders (e.g. highways authorities) in order to gather suitable evidence.</p>	Comments noted - LDC welcome continual engagement with Natural England
SIO700	Highways England (David Pyner)	3	<p>Welcomes the opportunity to continue to work with Lichfield District Council to ensure that any cross boundary issues related to impacts on the SRN are addressed. Highways England also supports the Council's recognition of the fact that ensuring that sustainable transport options are available to residents is a key consideration of the Local Plan Review.</p> <p>Welcomed that the importance the SRN plays in making the District attractive to employers and supporting economic growth is acknowledged within the report. A safe and efficient road network is a critical component which clearly has cross boundary impacts; as such it will be important for a robust evidence base to be developed (in collaboration with other transport bodies, as necessary) in order to inform growth options and to define infrastructure needs.</p>	Transport evidence will be required to inform the Local Plan Review
SIO701	Highways England (David Pyner)	8	<p>Highways England would agree that providing a choice of means of transport and the fact that high proportions of people commute to work by car, are key issues which should be considered by the Local Plan review. Other key issues arise from a need to address any existing safety and capacity issues, as may be identified through the preparation of the transport evidence base.</p>	Comments noted - LDC welcome continual engagement with Highways England
SIO702	Highways England (David Pyner)	9	<p>Highways England agrees that the vision and approach as set out in the adopted Local Plan (of focusing on town centres and key settlements as the main locations for growth) remain broadly relevant. The Strategic Objectives as set out in current Local Plan appear to remain broadly relevant. Highways England agrees that, in terms of sustainable transport, most growth should be directed towards existing sustainable urban and rural settlements to reduce the need for people to travel.</p>	Comments noted - LDC welcome continual engagement with Highways England
SIO703	Natural England (Antony Muller)	9	<p>We agree that the existing vision statement remains relevant. However in order to ensure that it takes account of the latest evidence and thinking in relation to the natural environment we would welcome the opportunity to discuss with the Council those themes and issues covered in the recently published government document 'A Green Future – Our 25 year plan to improve the environment' and how in practice these may result in any amendments to the vision for the district</p>	Comments noted - LDC welcome continual engagement with Natural England
SIO704	Highways England (David Pyner)	12	<p>Highways England do not wish to comment specifically on growth options at this stage including how Lichfield District Council should assist in meeting unmet housing needs arising from within the Greater Birmingham HMA. However, any proposals for locating additional residential development within the district to meet the needs of neighbouring authorities would need to be fully supported by relevant transport evidence which identifies their impact on the SRN.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This will include evidence relating to transport/infrastructure.
SIO705	Natural England (Antony Muller)	10	<p>Yes. Our response to Q9 regarding future discussion of the 25 year environment plan applies here too: We agree that the existing vision statement remains relevant. However in order to ensure that it takes account of the latest evidence and thinking in relation to the natural environment we would welcome the opportunity to discuss with the Council those themes and issues covered in the recently published government document 'A Green Future – Our 25 year plan to improve the environment' and how in practice these may result in any amendments to the vision for the district. Comments on specific sites subject to strategic measures River Mease SAC – This European Site is not specifically mentioned in the appendix but relevant evidence should be reviewed. At the time of writing we note that for example the 2011 Water Quality Management Plan for the River Mease references 'new standards resulting from the UKTAG (UK Technical Advisory Group) will be agreed in May 2012' in relation to phosphate (page 4). We acknowledge that in this case material changes to the evidence base may be expected to come forward through the project steering group (or equivalent) and associated work to ensure the mitigation measures remain appropriate and 'fit for purpose'</p>	Comments noted - LDC welcome continual engagement with Natural England
SIO706	Natural England (Antony Muller)	11	<p>Natural England would expect the advantages and disadvantages of such an approach to be fully articulated in the plan's sustainability appraisal. Any such policy should ensure that the interrelationship with 'cross cutting' policy themes dealing with sustainable development is clearly stated e.g. scope for criteria based policy (or policies) to ensure suitable standards of environmental resources are achieved (green and blue infrastructure including sustainable drainage systems, green and open spaces, ecological networks etc) alongside the required density of development.</p>	Comments noted. The Local Plan Review will be informed by a range of evidence including a comprehensive Sustainability Appraisal.

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SIO707	Highways England (David Pyner)	15	It is noted that the focus for sites to meet identifiable needs for Gypsy and Travellers should be on the A5 and A38 corridors. In this regard, any preferred options will need to ensure that appropriate provisions are in place for safe access and egress. It will need to be demonstrated that this can be achieved in a safe manner in compliance with requirements of the Design Manual for Roads and Bridges. Consideration will also need to be made of the need for capacity assessment of the SRN.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence including a Gypsy Traveller Needs Assessment.
SIO708	Natural England (Antony Muller)	12	We have no specific comments to offer on the district's role at this stage. However we attach separately a copy of our response to the original sustainability appraisal scoping consultation for the GBHMA review work, for reference. We would be happy to discuss any relevant considerations arising from this at a later date.	Comments noted
SIO709	Mike Smith, Walsall Borough Council	Whole Document	Overarching point of concern in that the Document does not provide figures for the number of homes, amount of employment land or other land uses that the Plan will seek to accommodate. It is therefore difficult to make a meaningful assessment of the various options put forward. We recognise that the Government's proposed standard methodology will determine the number of dwellings to be provided in the district to meet local need. However, the current local plan exceeds the number indicated in the methodology and it might be expected that the reviewed plan will also exceed this number in recognition of the expectation that Lichfield will continue to meet some of the housing shortfall arising from Birmingham and elsewhere in the housing market area.	Awaiting Government and HEDNA evidence.
SIO710	Natural England (Antony Muller)	18	Given the GBHMA context and the unanswered questions regarding location and density of new housing and employment land we would agree that the Council should consider producing further DPDs. In terms of additional locations over and above Lichfield City and Burntwood we would advocate an approach that responds to 'need' as and when decisions around the location, scale and density of new development is better understood.	Comments noted. This will be considered further as the Local Plan Review progresses
SIO711	Highways England (David Pyner)	21	Highways England has considered the 4 options presented for how residential growth could be distributed across the District. Highways England consider that any locations for residential growth should be assessed in terms of their sustainability in transport terms and how future residents could access sustainable modes of transport, employment options and local services without having to rely on the use of the car. In terms of Option 4 'New Settlement Development', and Questions 28-30, Highways England consider that, in certain circumstances, a new settlement can be a sustainable solution for meeting housing need if it is in a sustainable location and is accompanied by the right level of infrastructure and service provision. Any options for the development of a new settlement within Lichfield District must be considered in terms of potential impact on the SRN and the ability for residents to easily access sustainable modes of transport. A new development at Shenstone is likely to impact adversely upon the operation of the A5, A5148 and A38 trunk roads. It should be noted that Shenstone is to the immediate south of A5 Wall Island junction which already experiences capacity issues. However, it is likely that impacts at other SRN junctions in addition to A5 Wall Island will need to be assessed. Similarly, a new settlement at Fradley/Alrewas must be considered in terms of potential impacts on the SRN. Options for securing improvements to junctions on these roads should be explored as part of any assessment of the suitability of the locations for new settlement development. A new settlement at Thorpe Constantine could impact on the M42, and this must be considered as part of any cross boundary considerations with Tamworth Borough.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This will include evidence relating to transport/infrastructure.
SIO712	Natural England (Antony Muller)	19	We have no examples to offer at this stage	Comments noted

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO713	Fradley and Streethay Parish Council (Kate Roberts)	Whole Document	<p>Describes Fradley SDA as per Local Plan Strategy - No such associated facilities have been delivered to date. Planning Permissions secured but limited delivery on the ground. Recognised that 1250 is approximate set within overall LDC housing requirements. SDA boundary defined LPR offered and opportunity to set a logical SAD boundary to be able to achieve the betterment proposals advocated by the Parish Council. Site South of Hay End Lane - location description provided advocated for development as a way to extend SDA. Current SDA profile lack varied housing stock particularly small properties for downsizing restricted, need for an elderly village (current outline 18/00078/OUTMEI) compliments the overall needs of the area with 75% residents over 55, was supported by Fradley and Streethay Parish Council, offer different provision from that already within the SDA. The Local Plan fradley Profile promotes creating a more sustainable settlement in Fradley by bringing forward a strong mix use residential led development with a broad base of development types scale and nature the development will bring much wanted homes additionally based on local and district wide needs with properties for first time buyers through to an ageing population and an element of affordable housing.</p> <p>Curborough App/K34115/A/14/2224354 SofS supports more development in Lichfield in an area which is in the locality of Fradley. SofS attached weight provision of housing (para 7 & 8 NPPF) not diminished by five year supply moderate weight to environmental considerations.</p> <p>Decision reated on the social and economic benefits providing housing outweigh environmental considerations proposals allowed by SofS. Therefore LPA should aim to boost significantly the supply and range of housing (paras 47-50 and 186). LPS Policy 6 confirms need to identify new locations adjacent to settlements including SDA's. Fradley major role, strategy minimum would be appropriate to be exceed if there was no significant adverse effects. Further education and health provision is needed to create a cohesive and sustainable community hub, medical centre health and fitness facility day nursery convenience shopping north of the canal, - help reduce traffic and access limited existing facilities.</p> <p>The planned neighbourhood centre offers a range of community facilities including community hub medical centre health and fitness a day nursery and incidental shopping further Policy Fad 4 requires a mix of housing, these proposals would go further that what is currently permitted.</p> <p>Fradley NP reg 16 includes the following Policy FRANP14 based around the following explanation - There is interest in delivering care facilities for the elderly in Fradley and such provision is supported by the NP and unanimously by the PC. In particular such provision should seek to be well integrated with existing or newly planned development so that residents of any care facilities who are less mobile are not isolated from the wider community. Also there is a fast grow thing need for proper Sports Playing Field facilities for the children and adults who are currently having to use the facilities in other villages which is beginning to be limited due to their own growth and needs. A small area of the Wilson Bowden site on Hay End Lane has been earmarked for this by planners but without consultation with the Parish Council in the first instance. A more suitable location and size with adequate changing and social facilities could be provided within our Proposed Extension to the SDA - see attached pdf.</p>	Comments noted. Review proposes site as a new settlement which will be supported by the Infrastructure Delivery Plan which has considered the issues the P.C. identifies.
SIO714	S Jenkins	Whole Document	Greenbelt in Shenstone / Shenstone Wood End should not be used for Birmingham housing. As a Shenstone resident I am extremely upset by plans to allow Birmingham Authority to build in Lichfield where there are simply not enough facilities to accommodate current residents. The impact on the surround green belt, countryside and wildlife will be devastating and totally unnecessary when Birmingham has a significant number of empty properties they could use for this purpose.	The Strategic Housing Needs Study established the need.
SIO715	Natural England (Antony Muller)	20	Please see our responses to the specific questions within Appendix D (Q38-)	Comments noted
SIO716	Natural England (Antony Muller)	21	No specific comments on the appropriateness of this option though we agree with the stated opportunities and challenges	Comments noted.
SIO717	Natural England (Antony Muller)	22	In terms of opportunities this option may offer greater scope for strategic green and blue infrastructure provision than other options where development is more dispersed and/or smaller in scale. With regard to challenges the options involving Burntwood and the Sutton Coldfield area bring with them the need for management of recreation pressure on designated sites in the locality of these towns e.g. Chasewater & South Staffordshire Coalfield Heaths SSSI and Sutton Park SSSI and National Nature Reserve.	Comments noted.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO718	Highways England (David Pyner)	22	<p>Highways England has considered the 4 options presented for how residential growth could be distributed across the District. Highways England consider that any locations for residential growth should be assessed in terms of their sustainability in transport terms and how future residents could access sustainable modes of transport, employment options and local services without having to rely on the use of the car.</p> <p>In terms of Option 4 'New Settlement Development', and Questions 28-30, Highways England consider that, in certain circumstances, a new settlement can be a sustainable solution for meeting housing need if it is in a sustainable location and is accompanied by the right level of infrastructure and service provision. Any options for the development of a new settlement within Lichfield District must be considered in terms of potential impact on the SRN and the ability for residents to easily access sustainable modes of transport. A new development at Shenstone is likely to impact adversely upon the operation of the A5, A5148 and A38 trunk roads. It should be noted that Shenstone is to the immediate south of A5 Wall Island junction which already experiences capacity issues. However, it is likely that impacts at other SRN junctions in addition to A5 Wall Island will need to be assessed.</p> <p>Similarly, a new settlement at Fradley/Alrewas must be considered in terms of potential impacts on the SRN. Options for securing improvements to junctions on these roads should be explored as part of any assessment of the suitability of the locations for new settlement development. A new settlement at Thorpe Constantine could impact on the M42, and this must be considered as part of any cross boundary considerations with Tamworth Borough.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This will include evidence relating to transport/infrastructure.
SIO719	Highways England (David Pyner)	23	<p>Highways England has considered the 4 options presented for how residential growth could be distributed across the District. Highways England consider that any locations for residential growth should be assessed in terms of their sustainability in transport terms and how future residents could access sustainable modes of transport, employment options and local services without having to rely on the use of the car.</p> <p>In terms of Option 4 'New Settlement Development', and Questions 28-30, Highways England consider that, in certain circumstances, a new settlement can be a sustainable solution for meeting housing need if it is in a sustainable location and is accompanied by the right level of infrastructure and service provision. Any options for the development of a new settlement within Lichfield District must be considered in terms of potential impact on the SRN and the ability for residents to easily access sustainable modes of transport. A new development at Shenstone is likely to impact adversely upon the operation of the A5, A5148 and A38 trunk roads. It should be noted that Shenstone is to the immediate south of A5 Wall Island junction which already experiences capacity issues. However, it is likely that impacts at other SRN junctions in addition to A5 Wall Island will need to be assessed.</p> <p>Similarly, a new settlement at Fradley/Alrewas must be considered in terms of potential impacts on the SRN. Options for securing improvements to junctions on these roads should be explored as part of any assessment of the suitability of the locations for new settlement development. A new settlement at Thorpe Constantine could impact on the M42, and this must be considered as part of any cross boundary considerations with Tamworth Borough.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This will include evidence relating to transport/infrastructure.
SIO720	Highways England (David Pyner)	24	<p>Highways England has considered the 4 options presented for how residential growth could be distributed across the District. Highways England consider that any locations for residential growth should be assessed in terms of their sustainability in transport terms and how future residents could access sustainable modes of transport, employment options and local services without having to rely on the use of the car.</p> <p>In terms of Option 4 'New Settlement Development', and Questions 28-30, Highways England consider that, in certain circumstances, a new settlement can be a sustainable solution for meeting housing need if it is in a sustainable location and is accompanied by the right level of infrastructure and service provision. Any options for the development of a new settlement within Lichfield District must be considered in terms of potential impact on the SRN and the ability for residents to easily access sustainable modes of transport. A new development at Shenstone is likely to impact adversely upon the operation of the A5, A5148 and A38 trunk roads. It should be noted that Shenstone is to the immediate south of A5 Wall Island junction which already experiences capacity issues. However, it is likely that impacts at other SRN junctions in addition to A5 Wall Island will need to be assessed.</p> <p>Similarly, a new settlement at Fradley/Alrewas must be considered in terms of potential impacts on the SRN. Options for securing improvements to junctions on these roads should be explored as part of any assessment of the suitability of the locations for new settlement development. A new settlement at Thorpe Constantine could impact on the M42, and this must be considered as part of any cross boundary considerations with Tamworth Borough.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This will include evidence relating to transport/infrastructure.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO721	Highways England (David Pyner)	25	<p>Highways England has considered the 4 options presented for how residential growth could be distributed across the District. Highways England consider that any locations for residential growth should be assessed in terms of their sustainability in transport terms and how future residents could access sustainable modes of transport, employment options and local services without having to rely on the use of the car.</p> <p>In terms of Option 4 'New Settlement Development', and Questions 28-30, Highways England consider that, in certain circumstances, a new settlement can be a sustainable solution for meeting housing need if it is in a sustainable location and is accompanied by the right level of infrastructure and service provision. Any options for the development of a new settlement within Lichfield District must be considered in terms of potential impact on the SRN and the ability for residents to easily access sustainable modes of transport. A new development at Shenstone is likely to impact adversely upon the operation of the A5, A5148 and A38 trunk roads. It should be noted that Shenstone is to the immediate south of A5 Wall Island junction which already experiences capacity issues. However, it is likely that impacts at other SRN junctions in addition to A5 Wall Island will need to be assessed.</p> <p>Similarly, a new settlement at Fradley/Alrewas must be considered in terms of potential impacts on the SRN. Options for securing improvements to junctions on these roads should be explored as part of any assessment of the suitability of the locations for new settlement development. A new settlement at Thorpe Constantine could impact on the M42, and this must be considered as part of any cross boundary considerations with Tamworth Borough.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This will include evidence relating to transport/infrastructure.
SIO722	Highways England (David Pyner)	26	<p>Highways England has considered the 4 options presented for how residential growth could be distributed across the District. Highways England consider that any locations for residential growth should be assessed in terms of their sustainability in transport terms and how future residents could access sustainable modes of transport, employment options and local services without having to rely on the use of the car.</p> <p>In terms of Option 4 'New Settlement Development', and Questions 28-30, Highways England consider that, in certain circumstances, a new settlement can be a sustainable solution for meeting housing need if it is in a sustainable location and is accompanied by the right level of infrastructure and service provision. Any options for the development of a new settlement within Lichfield District must be considered in terms of potential impact on the SRN and the ability for residents to easily access sustainable modes of transport. A new development at Shenstone is likely to impact adversely upon the operation of the A5, A5148 and A38 trunk roads. It should be noted that Shenstone is to the immediate south of A5 Wall Island junction which already experiences capacity issues. However, it is likely that impacts at other SRN junctions in addition to A5 Wall Island will need to be assessed.</p> <p>Similarly, a new settlement at Fradley/Alrewas must be considered in terms of potential impacts on the SRN. Options for securing improvements to junctions on these roads should be explored as part of any assessment of the suitability of the locations for new settlement development. A new settlement at Thorpe Constantine could impact on the M42, and this must be considered as part of any cross boundary considerations with Tamworth Borough.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This will include evidence relating to transport/infrastructure.
SIO723	Highways England (David Pyner)	27	<p>Highways England has considered the 4 options presented for how residential growth could be distributed across the District. Highways England consider that any locations for residential growth should be assessed in terms of their sustainability in transport terms and how future residents could access sustainable modes of transport, employment options and local services without having to rely on the use of the car.</p> <p>In terms of Option 4 'New Settlement Development', and Questions 28-30, Highways England consider that, in certain circumstances, a new settlement can be a sustainable solution for meeting housing need if it is in a sustainable location and is accompanied by the right level of infrastructure and service provision. Any options for the development of a new settlement within Lichfield District must be considered in terms of potential impact on the SRN and the ability for residents to easily access sustainable modes of transport. A new development at Shenstone is likely to impact adversely upon the operation of the A5, A5148 and A38 trunk roads. It should be noted that Shenstone is to the immediate south of A5 Wall Island junction which already experiences capacity issues. However, it is likely that impacts at other SRN junctions in addition to A5 Wall Island will need to be assessed.</p> <p>Similarly, a new settlement at Fradley/Alrewas must be considered in terms of potential impacts on the SRN. Options for securing improvements to junctions on these roads should be explored as part of any assessment of the suitability of the locations for new settlement development. A new settlement at Thorpe Constantine could impact on the M42, and this must be considered as part of any cross boundary considerations with Tamworth Borough.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This will include evidence relating to transport/infrastructure.
SIO724	Natural England (Antony Muller)	27	The reliance on the private car for transport will need to be considered in relation to sustainability appraisal e.g. with regard to air quality impacts from increased traffic generation.	Comments noted.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO725	Highways England (David Pyner)	28	<p>Highways England has considered the 4 options presented for how residential growth could be distributed across the District. Highways England consider that any locations for residential growth should be assessed in terms of their sustainability in transport terms and how future residents could access sustainable modes of transport, employment options and local services without having to rely on the use of the car.</p> <p>In terms of Option 4 'New Settlement Development', and Questions 28-30, Highways England consider that, in certain circumstances, a new settlement can be a sustainable solution for meeting housing need if it is in a sustainable location and is accompanied by the right level of infrastructure and service provision. Any options for the development of a new settlement within Lichfield District must be considered in terms of potential impact on the SRN and the ability for residents to easily access sustainable modes of transport. A new development at Shenstone is likely to impact adversely upon the operation of the A5, A5148 and A38 trunk roads. It should be noted that Shenstone is to the immediate south of A5 Wall Island junction which already experiences capacity issues. However, it is likely that impacts at other SRN junctions in addition to A5 Wall Island will need to be assessed.</p> <p>Similarly, a new settlement at Fradley/Alrewas must be considered in terms of potential impacts on the SRN. Options for securing improvements to junctions on these roads should be explored as part of any assessment of the suitability of the locations for new settlement development. A new settlement at Thorpe Constantine could impact on the M42, and this must be considered as part of any cross boundary considerations with Tamworth Borough.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This will include evidence relating to transport/infrastructure.
SIO726	Highways England (David Pyner)	29	<p>Highways England has considered the 4 options presented for how residential growth could be distributed across the District. Highways England consider that any locations for residential growth should be assessed in terms of their sustainability in transport terms and how future residents could access sustainable modes of transport, employment options and local services without having to rely on the use of the car.</p> <p>In terms of Option 4 'New Settlement Development', and Questions 28-30, Highways England consider that, in certain circumstances, a new settlement can be a sustainable solution for meeting housing need if it is in a sustainable location and is accompanied by the right level of infrastructure and service provision. Any options for the development of a new settlement within Lichfield District must be considered in terms of potential impact on the SRN and the ability for residents to easily access sustainable modes of transport. A new development at Shenstone is likely to impact adversely upon the operation of the A5, A5148 and A38 trunk roads. It should be noted that Shenstone is to the immediate south of A5 Wall Island junction which already experiences capacity issues. However, it is likely that impacts at other SRN junctions in addition to A5 Wall Island will need to be assessed.</p> <p>Similarly, a new settlement at Fradley/Alrewas must be considered in terms of potential impacts on the SRN. Options for securing improvements to junctions on these roads should be explored as part of any assessment of the suitability of the locations for new settlement development. A new settlement at Thorpe Constantine could impact on the M42, and this must be considered as part of any cross boundary considerations with Tamworth Borough.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This will include evidence relating to transport/infrastructure.
SIO727	Highways England (David Pyner)	30	<p>Highways England has considered the 4 options presented for how residential growth could be distributed across the District. Highways England consider that any locations for residential growth should be assessed in terms of their sustainability in transport terms and how future residents could access sustainable modes of transport, employment options and local services without having to rely on the use of the car.</p> <p>In terms of Option 4 'New Settlement Development', and Questions 28-30, Highways England consider that, in certain circumstances, a new settlement can be a sustainable solution for meeting housing need if it is in a sustainable location and is accompanied by the right level of infrastructure and service provision. Any options for the development of a new settlement within Lichfield District must be considered in terms of potential impact on the SRN and the ability for residents to easily access sustainable modes of transport. A new development at Shenstone is likely to impact adversely upon the operation of the A5, A5148 and A38 trunk roads. It should be noted that Shenstone is to the immediate south of A5 Wall Island junction which already experiences capacity issues. However, it is likely that impacts at other SRN junctions in addition to A5 Wall Island will need to be assessed.</p> <p>Similarly, a new settlement at Fradley/Alrewas must be considered in terms of potential impacts on the SRN. Options for securing improvements to junctions on these roads should be explored as part of any assessment of the suitability of the locations for new settlement development. A new settlement at Thorpe Constantine could impact on the M42, and this must be considered as part of any cross boundary considerations with Tamworth Borough.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This will include evidence relating to transport/infrastructure.
SIO728	Natural England (Antony Muller)	38	We feel that the proposed structure should be effective.	Comments noted
SIO729	Natural England (Antony Muller)	39	We believe the infrastructure prioritisation tool may function as a framework for decision-making but will need to be accompanied by qualitative assessment in order to arrive at a fully considered conclusion.	Comments noted: The "Proposed Structure" will ensure that identified needs and project responses are based on qualitative evidence based work, this will also inform any prioritisation process.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO730	Mike Smith, Walsall Borough Council	1	The base date of the plan should use the date of the latest available household projections (currently 2014) to ensure that the plan fully addresses known projected need.	Comments noted, there will need to be a consideration of any agreements between the GBBCHMA over plan period start dates
SIO731	Natural England (Antony Muller)	40	We believe this question to be asking 'do you agree with the identified prioritisation categories and their definition?' No - We acknowledge the definitions offered for 'Critical' and 'Essential'. However with regard to the definition offered for 'Important' the thought process underlying this categorisation 'outcome' is not clear. This needs to be addressed. A question arises over when during the infrastructure planning process such categories are to be attached and the sequence in which consideration is given. These would appear to significantly influence the resulting category. The proposed infrastructure's relationship with sustainability Appraisal and Habitats Regulations Assessment also needs consideration. Sustainability appraisal will influence relevant policy making e.g. through criteria based policies. Habitats Regulations Assessment will have a role both at the plan making and project (planning application/equivalent) level.	Comments noted: Agree the assessment of identified categories will require the support of a robust assessment framework which will ensure that there is clarity surrounding categories.
SIO732	Mike Smith, Walsall Borough Council	2	All evidence that identifies need over particular time-periods should be updated to cover the proposed period of the reviewed plan. Evidence that was prepared using national guidance or definitions should also be revised where these have changed. Examples include the SHMA and GTAA, both of which were last updated in 2012. The SHMA needs to take account of the new housing needs methodology and any revisions in the draft NPPF Review when these are introduced. The GTAA should take account of the revised definition of travellers for planning purpose in the 2015 PPTS. The Local Plan should also take into account evidence from the Staffordshire Minerals Local Plan on minerals safeguarding areas and areas where mineral extraction is permitted or planned in Lichfield District.	Consideration to undertaking a HEDNA will be undertaken Comments noted updated to GTAA will be considered
SIO733	Jodie McCabe	Whole Document	<p>Housing Provision Concerned over the lack of clarity about what number of houses is required over the plan period. How can the Council start to determine what strategy is required if there is no clarification about the needs of the District and the needs arising from the wider HMA that will be delivered in Lichfield. Until a housing target is set I fail to see how the District can plan adequately for housing delivery and am concerned that this consultation is premature.</p> <p>Need of Birmingham The evidence base needs to clearly distinguish between the needs of the population of Lichfield District and the contribution to the needs of Birmingham / wider HMA. The BGS recommends a number of sites / locations to be considered further and it is essential these are not considered in isolation within the authorities but are considered in a comprehensive manner. West Midlands should be forward thinking and should think outside the box in terms of how it delivers housing targets. Focus should be on revitalising areas of low demand that has significant areas of unused, previously developed land rather than eating up the countryside.</p> <p>Development Strategy Council must ensure options outside the Green Belt are exhausted before considering the release of Green Belt. The Growth Strategy should be focused around Option 1 and should focus on main urban areas, with possibly some extensions away from the Green Belt. The Key Villages may have some small scale development. Option 4 cannot be justified as the council has failed to provide sufficient evidence that a new settlement is required. Outlines key reasons why Shenstone is not an appropriate location for new settlement, including issues with local road capacity, the justification within the SGS relating to the M6 and the railway station, loss of accessible countryside, loss of agricultural land and loss of wildlife. Shenstone provides principle contribution towards the purposes of containing sprawl and maintaining separation. Concerns about new urban extension at Little Aston / Shenstone Wood End for similar reasons.</p> <p>Concerned about the lack of consultation on this document.</p>	Awaiting Government and HEDNA evidence on housing provision. Agreed on methodology for Greater Birmingham BC Housing Market Area.
SIO734	Highways England (David Pyner)	31	<p>The two options for Employment growth should be considered in the context of potential impacts on the SRN and necessitate the preparation of an appropriate transport evidence base. Development at Fradley Park should be considered in terms of impact on the A38 and how junction improvements could be secured from any development which comes forward.</p> <p>It is noted that the report suggests new locations for employment development, including at Bassets Pole. Whilst the A38 is not part of the SRN at this location, there is potential for impacts on the A5 in the Mile Oak area, and also the A38/A5 in the vicinity of Weeford.</p>	Agreed; the SRN and Highways are acknowledged challenges to infrastructure, including highways, for both options.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO735	Tarmac (Darren Bell David Lock Associates)	whole Document	<p>David Lock Associates, on behalf of Tarmac, has prepared this response to the Lichfield Local Plan Review: Scope, Issues and Options consultation document (April 2018). Tarmac, a CRH company, is a leading sustainable materials and construction company responsible for delivering infrastructure solutions necessary to supporting the growing economy. Tarmac has major landholdings in the district subject to either existing or former quarrying as well as a track record of restoration to sustainable after uses. 2. Tarmac welcomes the review of the Lichfield Local Plan 2020-2036. It is timely in the context of an emerging revised National Planning Policy Framework and the need for Lichfield District Council (LDC) to fully consider what share of the unmet housing need of Greater Birmingham Housing Market Area can be taken. The Greater Birmingham Housing Market Area (GBHMA) Strategic Growth Study (February 2018) showed an unmet need of over 60,000 dwellings up to 2036.1 Notwithstanding the Government's proposed standardised housing methodology, there is likely to be the need to find significant additional housing land in the district.</p> <p>3. It is in this overarching context that Tarmac wish to highlight a key opportunity that could help deliver new housing and infrastructure on land owned at Alrewas Quarry. Figure 1 shows the extent of the land which is under Tarmac's freehold ownership. There is a key opportunity for LDC to deliver new housing growth through a new Garden Village on land near Alrewas. It would help deliver the unmet housing needs of Birmingham and new needs of the district and could help deliver transformative infrastructure to encourage green travel choices and connect people with jobs, for example, through facilitating a new station for passenger services on the adjoining rail line. It could also provide substantial benefits to the National Memorial Arboretum.</p> <p>26. The Garden Village is on land in single ownership, is deliverable in the plan period and could be developed in its own right but could also form part of a strategy for a larger new settlement on land between Lichfield and Alrewas.27. Tarmac is preparing more detailed information to support the case for the Garden Village and suggest that this options is progressed through the next stages of the Lichfield Local Plan Review.</p>	Comments noted.
SIO735	Tarmac (Darren Bell David Lock Associates)	whole Document	<p>David Lock Associates, on behalf of Tarmac, has prepared this response to the Lichfield Local Plan Review: Scope, Issues and Options consultation document (April 2018). Tarmac, a CRH company, is a leading sustainable materials and construction company responsible for delivering infrastructure solutions necessary to supporting the growing economy. Tarmac has major landholdings in the district subject to either existing or former quarrying as well as a track record of restoration to sustainable after uses. 2. Tarmac welcomes the review of the Lichfield Local Plan 2020-2036. It is timely in the context of an emerging revised National Planning Policy Framework and the need for Lichfield District Council (LDC) to fully consider what share of the unmet housing need of Greater Birmingham Housing Market Area can be taken. The Greater Birmingham Housing Market Area (GBHMA) Strategic Growth Study (February 2018) showed an unmet need of over 60,000 dwellings up to 2036.1 Notwithstanding the Government's proposed standardised housing methodology, there is likely to be the need to find significant additional housing land in the district.</p> <p>3. It is in this overarching context that Tarmac wish to highlight a key opportunity that could help deliver new housing and infrastructure on land owned at Alrewas Quarry. Figure 1 shows the extent of the land which is under Tarmac's freehold ownership. There is a key opportunity for LDC to deliver new housing growth through a new Garden Village on land near Alrewas. It would help deliver the unmet housing needs of Birmingham and new needs of the district and could help deliver transformative infrastructure to encourage green travel choices and connect people with jobs, for example, through facilitating a new station for passenger services on the adjoining rail line. It could also provide substantial benefits to the National Memorial Arboretum.</p> <p>26. The Garden Village is on land in single ownership, is deliverable in the plan period and could be developed in its own right but could also form part of a strategy for a larger new settlement on land between Lichfield and Alrewas.27. Tarmac is preparing more detailed information to support the case for the Garden Village and suggest that this options is progressed through the next stages of the Lichfield Local Plan Review.</p>	Comments noted
SIO736	Highways England (David Pyner)	32	<p>The two options for Employment growth should be considered in the context of potential impacts on the SRN and necessitate the preparation of an appropriate transport evidence base. Development at Fradley Park should be considered in terms of impact on the A38 and how junction improvements could be secured from any development which comes forward.</p> <p>It is noted that the report suggests new locations for employment development, including at Bassets Pole. Whilst the A38 is not part of the SRN at this location, there is potential for impacts on the A5 in the Mile Oak area, and also the A38/A5 in the vicinity of Weeford.</p>	Agreed- a planning practice guidance compliant transport assessment will be undertaken. The Strategy for the A5 included the A5/A453/B5404 Mile Oak, Tamworth – junction modifications.
SIO737	Highways England (David Pyner)	33	<p>The two options for Employment growth should be considered in the context of potential impacts on the SRN and necessitate the preparation of an appropriate transport evidence base. Development at Fradley Park should be considered in terms of impact on the A38 and how junction improvements could be secured from any development which comes forward.</p> <p>It is noted that the report suggests new locations for employment development, including at Bassets Pole. Whilst the A38 is not part of the SRN at this location, there is potential for impacts on the A5 in the Mile Oak area, and also the A38/A5 in the vicinity of Weeford.</p>	See response to representation SIO736

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO738	Highways England (David Pyner)	34	<p>The two options for Employment growth should be considered in the context of potential impacts on the SRN and necessitate the preparation of an appropriate transport evidence base. Development at Fradley Park should be considered in terms of impact on the A38 and how junction improvements could be secured from any development which comes forward.</p> <p>It is noted that the report suggests new locations for employment development, including at Bassets Pole. Whilst the A38 is not part of the SRN at this location, there is potential for impacts on the A5 in the Mile Oak area, and also the A38/A5 in the vicinity of Weeford.</p>	Agreed- a planning practice guidance compliant transport assessment will be undertaken. The Strategy for the A5 included the A5/A453/B5404 Mile Oak, Tamworth – junction modifications.
SIO739	Mike Smith, Walsall Borough Council	3	<p>There is no reference to retail and centres, including Class B1 (a) office uses, which can have significant cross-boundary impacts. The Local Plan also needs to consider the implications of the Staffordshire Waste and Minerals Local Plans for land use in Lichfield District. In particular, it needs to consider whether employment areas could accommodate waste infrastructure, and whether it is appropriate to identify locations for housing development in minerals safeguarding areas (particularly sand and gravel) and areas where mineral extraction is permitted or planned.</p>	<p>Comments noted, LDC welcomes the opportunity to work with WMBC on the impact of centres.</p> <p>Comments noted consideration of minerals and waste is an important factor for the Plan to consider</p>
SIO741	Mike Smith, Walsall Borough Council	4	<p>The potential need to amend or replace these policies will depend to a large extent on the revised assessments of need for housing and other land uses arising from the new time period for the proposed plan and changes in national policy since the existing evidence was prepared. With respect to the area-specific policies, these will need to change depending on what option for the location of development is chosen.</p>	Comments noted
SIO742	Mike Smith, Walsall Borough Council	5	<p>Some of these policies may need to be revised to reflect any changes in the NPPF and PPG. Policies CP4 and IP1 may need to be updated if the CIL Regulations and associated policies and guidance are changed. Paragraph 9.32 (under policy CP9), and policies NR7 and NR8 refer to Special Areas of Conservation. These should be checked against the latest developments in case law on this topic. Policy Lichfield 6 may need to be updated to reflect development that has now taken place and planning permissions that have been granted in this area. Further revision may be required if the chosen growth options proposed additional development here.</p>	The revised NPPF will need to be considered through the Local Plan Review process
SIO743	Mike Smith, Walsall Borough Council	6	<p>We consider there to be a need for Core Policy 8 to be included in the revised Local Plan as there is still a need to have an overarching policy approach towards centres that is then supported by detailed DPDs. No comments to make on the thresholds for retail impact assessments (Policy E1) as long as they are supported by the relevant evidence. We do wonder whether there should be any consideration to the impact of out-of-centre and edge-of-centre leisure uses, as such developments can impact on the health of centres, and with the changing role of centres, leisure will play an increasingly important function.</p> <p>We note that in Appendix B you state that a number of policies will not be changed and can be added to the Local Plan Review. However, it is unclear if this conclusion takes into account the consultation responses to the Lichfield District Council Local Plan Allocations Focused Changes Consultation.</p> <p>The area specific policies might need to be updated to reflect developments that have now taken place and planning permissions that have been granted in the areas. Further revisions might be required if the chosen growth options proposed additional development here.</p>	Comments noted, evidence associated with retail/ centres impact will need to be considered
SIO744	Tarmac (Darren Bell David Lock Associates)	9	<p>There is a need to reconsider the vision and strategic priorities of the Local Plan by allowing for a strategic development location south and east of Alrewas. Most of the vision for the District remains relevant, and is agreed with, but it should be amended to anticipate strategic development having a role in meeting the housing needs of both Lichfield and the wider Housing Market Area, including the unmet needs of the Greater Birmingham. It should also refer to the potential transformation of the A38 corridor to a multi-modal transport corridor supporting sustainable travel choices.</p>	Comments noted, matters raised here will need to be considered in the context of settlement growth. This could impact the vision
SIO745	Highways England (David Pyner)	36	<p>The two options for Employment growth should be considered in the context of potential impacts on the SRN and necessitate the preparation of an appropriate transport evidence base. Development at Fradley Park should be considered in terms of impact on the A38 and how junction improvements could be secured from any development which comes forward.</p> <p>It is noted that the report suggests new locations for employment development, including at Bassets Pole. Whilst the A38 is not part of the SRN at this location, there is potential for impacts on the A5 in the Mile Oak area, and also the A38/A5 in the vicinity of Weeford.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This will include evidence relating to transport/infrastructure.
SIO746			Blank	No comment made.
SIO747	Highways England (David Pyner)	37	<p>The two options for Employment growth should be considered in the context of potential impacts on the SRN and necessitate the preparation of an appropriate transport evidence base. Development at Fradley Park should be considered in terms of impact on the A38 and how junction improvements could be secured from any development which comes forward.</p> <p>It is noted that the report suggests new locations for employment development, including at Bassets Pole. Whilst the A38 is not part of the SRN at this location, there is potential for impacts on the A5 in the Mile Oak area, and also the A38/A5 in the vicinity of Weeford.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This will include evidence relating to transport/infrastructure.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO748	Tarmac (Darren Bell David Lock Associates)	10	The strategic objectives should include an additional objective of creating a sustainable new settlement as part of a multi-faceted approach of meeting the housing needs of the district. It would also be beneficial to recognise the importance of the National Memorial Arboretum (NMA) as a major visitor attraction and an objective should support the sustainable growth of the NMA through infrastructure and development.	Comments noted, an assessment of where growth will take occur needs to be undertaken In relation to the NMA this will be considered in consultation with the NMA
SIO749	Highways England (David Pyner)	38	<p>It is welcomed that Lichfield District Council proposes to review the existing IDP. In comments made to the Site Allocations focussed changes, Highways England noted that 'the current Infrastructure Delivery Plan 2017 appears to largely rely on historical information prepared at Local Plan stage and, in our view, cannot now be relied upon to support the specific allocations put forward'. These comments remain current.</p> <p>Highways England would welcome the opportunity to contribute towards a review of the IDP to ensure that the necessary infrastructure requirements to support growth proposals in the District are identified. This will seek to facilitate and inform the IDP process including definition on the sources/availability of funding and appropriate bodies and mechanisms for delivery. It is important to ensure that the necessary mechanisms are in place to fund and deliver the required infrastructure at the appropriate time.</p>	Comments noted: The District Council is committed to working with strategy providers, developers and other service providers to enable the sustainable development within the District.
SIO750	Mike Smith, Walsall Borough Council	8	Table 3.1 identifies the main issues that may have cross boundary implications, but as currently worded, this is not entirely clear. For example, Issue 1 should arguably be more explicit about contributing towards the needs of other areas that cannot meet all of their own requirements, as well as the needs arising within Lichfield District. Issues 8 and 9 could also be clearer about the need for good transport links to neighbouring areas, such as Walsall. This will be particularly important if it is agreed that some of Walsall's housing and employment needs will be met in Lichfield District.	To date there has been no agreement to accommodate any of Walsall's housing needs. As such it is pre-emptive to consider making such changes at this stage.
SIO751	Highways England (David Pyner)	39	<p>It is welcomed that Lichfield District Council proposes to review the existing IDP. In comments made to the Site Allocations focussed changes, Highways England noted that 'the current Infrastructure Delivery Plan 2017 appears to largely rely on historical information prepared at Local Plan stage and, in our view, cannot now be relied upon to support the specific allocations put forward'. These comments remain current.</p> <p>Highways England would welcome the opportunity to contribute towards a review of the IDP to ensure that the necessary infrastructure requirements to support growth proposals in the District are identified. This will seek to facilitate and inform the IDP process including definition on the sources/availability of funding and appropriate bodies and mechanisms for delivery. It is important to ensure that the necessary mechanisms are in place to fund and deliver the required infrastructure at the appropriate time.</p>	Comments noted: The District Council is committed to working with strategy providers, developers and other service providers to enable the sustainable development within the District.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO752	Tarmac (Darren Bell David Lock Associates)	12	<p>LDC should seek to meet as much of the unmet housing needs of the wider Housing Market Area as it can in the most sustainable ways. There is a legal duty to cooperate with other authorities and there is an acute shortfall of housing.</p> <p>7. Both existing and emerging national policies support the planning of strategic developments, including new settlements. For example, the draft NPPF sets out that:</p> <p>“the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing Villages and towns. Working with the support of their communities, and other authorities if appropriate, strategic plan-making authorities should identify suitable opportunities for such development where this can help to meet identified needs in a sustainable way. In doing so, they should consider the opportunities presented by existing or planned investment in infrastructure, the area’s economic potential and the scope for net environmental gains.” (Paragraph 73).</p> <p>8. LDC can and should assist in meeting the unmet needs from the wider Housing Market Area through identifying a new settlement that will not only deliver new homes at scale but also deliver new infrastructure to help connect new homes with employment centres via public transport and deliver environmental benefit. A clear opportunity exists to for such a new settlement on land to the east of the A38 (T) in the Alrewas/Fradley area.</p>	Comments noted. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield.
SIO753	Highways England (David Pyner)	40	<p>It is welcomed that Lichfield District Council proposes to review the existing IDP. In comments made to the Site Allocations focussed changes, Highways England noted that ‘the current Infrastructure Delivery Plan 2017 appears to largely rely on historical information prepared at Local Plan stage and, in our view, cannot now be relied upon to support the specific allocations put forward’. These comments remain current.</p> <p>Highways England would welcome the opportunity to contribute towards a review of the IDP to ensure that the necessary infrastructure requirements to support growth proposals in the District are identified. This will seek to facilitate and inform the IDP process including definition on the sources/availability of funding and appropriate bodies and mechanisms for delivery. It is important to ensure that the necessary mechanisms are in place to fund and deliver the required infrastructure at the appropriate time.</p>	Comments noted: The District Council is committed to working with strategy providers, developers and other service providers to enable the sustainable development within the District.
SIO754	Highways England (David Pyner)	41	<p>It is welcomed that Lichfield District Council proposes to review the existing IDP. In comments made to the Site Allocations focussed changes, Highways England noted that ‘the current Infrastructure Delivery Plan 2017 appears to largely rely on historical information prepared at Local Plan stage and, in our view, cannot now be relied upon to support the specific allocations put forward’. These comments remain current.</p> <p>Highways England would welcome the opportunity to contribute towards a review of the IDP to ensure that the necessary infrastructure requirements to support growth proposals in the District are identified. This will seek to facilitate and inform the IDP process including definition on the sources/availability of funding and appropriate bodies and mechanisms for delivery. It is important to ensure that the necessary mechanisms are in place to fund and deliver the required infrastructure at the appropriate time.</p>	Comments noted: The District Council is committed to working with strategy providers, developers and other service providers to enable the sustainable development within the District.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO755	Highways England (David Pyner)	42	<p>It is welcomed that Lichfield District Council proposes to review the existing IDP. In comments made to the Site Allocations focussed changes, Highways England noted that 'the current Infrastructure Delivery Plan 2017 appears to largely rely on historical information prepared at Local Plan stage and, in our view, cannot now be relied upon to support the specific allocations put forward'. These comments remain current.</p> <p>Highways England would welcome the opportunity to contribute towards a review of the IDP to ensure that the necessary infrastructure requirements to support growth proposals in the District are identified. This will seek to facilitate and inform the IDP process including definition on the sources/availability of funding and appropriate bodies and mechanisms for delivery. It is important to ensure that the necessary mechanisms are in place to fund and deliver the required infrastructure at the appropriate time.</p>	Comments noted: The District Council is committed to working with strategy providers, developers and other service providers to enable the sustainable development within the District.
SIO756	Highways England (David Pyner)	43	<p>It is welcomed that Lichfield District Council proposes to review the existing IDP. In comments made to the Site Allocations focussed changes, Highways England noted that 'the current Infrastructure Delivery Plan 2017 appears to largely rely on historical information prepared at Local Plan stage and, in our view, cannot now be relied upon to support the specific allocations put forward'. These comments remain current.</p> <p>Highways England would welcome the opportunity to contribute towards a review of the IDP to ensure that the necessary infrastructure requirements to support growth proposals in the District are identified. This will seek to facilitate and inform the IDP process including definition on the sources/availability of funding and appropriate bodies and mechanisms for delivery. It is important to ensure that the necessary mechanisms are in place to fund and deliver the required infrastructure at the appropriate time.</p>	Comments noted: The District Council is committed to working with strategy providers, developers and other service providers to enable the sustainable development within the District.
SIO757	Tarmac (Darren Bell David Lock Associates)	28	<p>Tarmac welcomes and agrees with the identification of the Alrewas and Fradley area as a potential location for a new settlement. It is right that LDC considers the option of delivering its growth through a new settlement. Whilst the Greater Birmingham Housing Market Area Strategic Growth Study (February 2018) did not recommend the new settlement in this location as a preferred option, the review was undertaken at a high level and it did not preclude the consideration of opportunities at the Local Plan level. Moreover, the A38 (T) corridor is identified in the study as the best opportunity for strategic development in the Lichfield area and the location is free from major environmental, technical and national policy constraints (notably Green Belt).</p> <p>10. It was excluded as a preferred approach to growth in the report because of limited existing public transport services, flooding constraints and the need for other physical infrastructure. It is, however, the case that physical infrastructure and public transport can be and would be facilitated by new strategic development. Whilst there are areas of flood zones 2 and 3, Tarmac has extensive land that falls within flood zone 1 and the ability to mitigate flood risk through its own landholdings. It was also suggested in the report that the location is too far from Birmingham (beyond 15km) to help deliver unmet housing needs. This is inconsistent with the fact it lies within the GBHMA and by definition can, therefore, help to meet housing needs in that HMA.2 Moreover, the potential for a new rail station greatly enhances connectivity opportunities with Birmingham.</p> <p>11. It is Tarmac's view, the location offers a sustainable and deliverable option for new homes, jobs and infrastructure in the period up to 2036. Its location could and should capitalise on the A38 (T) and rail lines to deliver good public transport connectivity to Lichfield, Birmingham, Burton and Derby.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO758	Mike Smith, Walsall Borough Council	9	We would support updating the vision to include helping to meet the needs of the Greater Birmingham Housing Market Area. This should include the possible need for housing and supporting economic development that cannot be accommodated in the Black Country.	The Review does include reference to the GBHMA shortfall.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO759	Tarmac (Darren Bell David Lock Associates)		<p>The Garden Village opportunity</p> <p>12. Tarmac owns substantial land to the east and south of Alrewas alongside the A38 (T) and the rail line which offers the potential for a Garden Village. Garden Villages are defined by the Government as new settlements from 1,500 dwellings upwards and can help deliver exceptional places with high quality design, green spaces and local services whilst also having a place-specific management and governance arrangements.</p> <p>13. Figure 1 shows the land owned under freehold by Tarmac, that can be developed for a Garden Village, lying to the east of the A38 (T) and north and south of the A513 (Croxhall Road). The site is land that has been worked or is being worked for minerals immediately south of the National Memorial Arboretum and this presents a unique opportunity to design a new village which is both supportive of and influenced by the Arboretum. The new village could help enable the use of the Lichfield to Burton rail line (via Wichnor junction) for passenger services and a new station and Park&Ride to the benefit of the new village, the NMA, Alrewas and commuters to Lichfield and Birmingham. The site is also only 2km from major employment at Fradley and only 7.5km from Lichfield and 10km from Burton upon Trent.</p> <p>14. A new Garden Village in this location will deliver:</p> <ul style="list-style-type: none"> · Well-designed new homes to meet a range of needs including open market, affordable rent, low cost market housing, specialist needs and custom or self-build opportunities. · Infrastructure and other uses to meet the specific short and medium needs of the NMA and deliver longer term development complementary to the NMA. · A new rail station and Park&Ride utilising new passenger's services between Burton and Lichfield Trent Valley. · Generous new green spaces and planting in response to Garden settlement principles, NMA and the National Forest objectives and the character of the river corridor. <p>15. Tarmac is in discussions with the NMA to understand future aspirations and current needs and to understand how a Garden Village in this location could be complementary and supportive of the NMA. On land immediately adjoining the NMA this could include additional infrastructure and green open space, improved accessibility and new visitor facilities and accommodation. Other uses are being explored that would be complementary to both the NMA and Garden Village principles such as specialist housing and low-cost employment space. These uses can form a key part of the Garden Village concept to create a distinctive and sustainable development.</p> <p>Sustainable development</p> <p>16. When assessed against the three main components of sustainable development, as set out in the NPPF (economic, social and environmental), a Garden Village in this location would have the following demonstrative benefits:</p> <p>Economic:</p> <ul style="list-style-type: none"> · Increasing the supply of new market and affordable homes · Supporting the economic viability of the NMA. · Connecting homes with jobs. · New jobs and training associated with construction and the new uses on site. <p>Social:</p> <ul style="list-style-type: none"> · Meeting a variety of local housing needs. · New community facilities and social infrastructure, including those related to the objectives of the NMA and a new primary school <p>Environmental:</p> <p>A positive after use of land previously worked for minerals.</p> <p>A site with few environmental constraints outside of the Green Belt.</p> <p>New public transport and cycling opportunities to reduce trips by car</p> <p>New public open spaces connecting into wider green infrastructure network</p> <p>Environmental:</p> <ul style="list-style-type: none"> · A positive after use of land previously worked for minerals. · A site with few environmental constraints outside of the Green Belt. · New public transport and cycling opportunities to reduce trips by car. <p>17. Regard has also been given to the fifteen objectives of the Sustainable Assessment undertaken of Lichfield Local Plan Review Scope Issues and Options document. In addition to the positive scores already attributed to the Growth Option 4, the reuse of the former quarried land would help encourage the efficient use of land and the proposed mix of uses and public transport infrastructure would mean a positive assessment in terms of increasing the use of non-car travel and reducing the need for travel. In this context the option scores at least as well as the other three options considered.</p> <p>Delivery</p> <p>18. Tarmac has worked minerals in the area for several decades and has restored land to positive environmental and social after uses, notably the National Memorial Arboretum.</p> <p>19. In 2015, planning permission was granted for an extension to Alrewas Quarry to extract sand and gravels for a 12-year period meaning extraction would need to cease by 2027 and restoration occur by 2029.</p> <p>20. The combination of the historic and future mineral working means that a phased cessation and restoration of land is underway, with some land worked and restored and immediately available (subject to planning), other land worked and in the process of fill and restoration, with the remaining land yet to be worked.</p> <p>21. In response to the reference in the Scope, Issues and Options paper to mineral safeguarding policies in the area (paragraph 11.6), it is relevant that the majority of the minerals within the Alrewas and Fradley area, and to the East of the A38, either have been, or will be worked during the plan period and. Development on the land is entirely feasible and would not sterilise mineral resources.</p> <p>22. The initial appraisal shows that a new Garden Village could be developed for approximately 1,500 new homes overall, alongside a new local centre, primary school, small scale employment uses, new green open spaces and supporting infrastructure. Initial assessment shows that the site could be phased to allow for early development on some land in the first five years of the plan (by 2025) and remaining development over the period 2026-2036. Tarmac is in the process of preparing a Delivery and Design Report to provide more details on how a sustainable development could be achieved within the plan period. The opportunity for a larger new settlement</p> <p>23. A new Garden Village on Tarmac's land offers a sustainable and deliverable</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
			<p>development in its own right. Other land is also being promoted for potential development between Alrewas and Lichfield (part of the previously promoted as Brookhay Villages) and Tarmac will continue to discuss shared opportunities with those landowners and development promoters.</p> <p>24. The proposal being put forward on Tarmac land does not undermine the wider opportunity being pursued as the form of a larger new settlement would likely comprises a series of connected villages or neighbourhoods. The GBHMA Strategic Housing Needs Study Stage 3 (2016) supports this the prospect of new settlements being phased to deliver smaller developments in the short-term but with the ability to expand over time. Tarmac's land provides an opportunity to deliver either a Garden Village on its own as a key phase of a larger new settlement in the Alrewas/Fradley area.</p>	
SIO760	Mike Smith, Walsall Borough Council	10	Strategic objectives 6, 7 and 8 should refer additionally to helping to meet the housing and resulting employment needs arising from the wider housing market area as well as residents of Lichfield District.	The Review does include reference to the GBHMA shortfall. However it is recognised that the Plan Review will need to deal with cross boundary issues

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SIO761	Ben Adams	Whole Document	<p>Resident of Shenstone and represent a County Council division in Tamworth.</p> <p>Welcome the LPR and acknowledgement that Lichfield is likely to be required to assist in allocating land to meet the Greater Birmingham shortfall and need to sound out public opinion on how best to provide assistance.</p> <p>Supports proposals that retain the high quality of life enjoyed by Lichfield's residents and those of residents in immediate neighbouring areas. All allocations should seek not to exhaust the capacity of infrastructure, services and transport links but maintain and enhance them.</p> <p>Expects the Council to favour allocations that conform with the current policies as these have underpinned the current local plan and helped it to progress steadily. Fundamental policies are those that protect the green belt and preserve the character of the City.</p> <p>First three options each have merit and a balanced approach. New settlements should only be considered to cater for exceptional demands such as those required by duty to cooperate. Future iterations of the Plan should separate the proposals to deal with Lichfield's needs from Birmingham's needs. Should a review of green belt or conservation policy be necessary to provide for new settlements then I think residents should be given the opportunity to approve or reject any substantive changes in this most fundamental District planning policy in a local election first. If there are greenfield options available however where a new settlement would have limited negative impact on existing communities then I would seek to negotiate with central government and Greater Birmingham as soon as practical.</p> <p>Sets out considerations for planners - work to current adopted policies, work within the confines of existing local plan and neighbourhood plans and work more closely with neighbours when allocating land in Lichfield on the boundary of neighbouring settlements.</p>	Comments noted. Neighbourhood Planning is the appropriate elective process in local planning policy alongside this Local Plan process.
SIO762	Essington Park Ltd (CT Planning)	1	Yes the plan period of 2020-2036 is appropriate.	Comments noted.
SIO763	Mike Smith, Walsall Borough Council	11	We agree that the Plan should include a minimum density policy for housing to ensure that land is used effectively. This should take account of any requirement in the NPPF Review.	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO764	Essington Park Ltd (CT Planning)	3	Yes. The key strategic cross boundary issues have been identified.	Comments noted.
SIO765	Mike Smith, Walsall Borough Council	12	Any target set for Lichfield District, both for housing and for economic development, should ensure that it does not undermine the continuing regeneration of the Black Country. However, the emerging evidence from the Black Country Core Strategy Review indicates that the Black Country is not able to meet its own needs to 2036 for land both for housing and employment. Walsall and the other Black Country authorities will continue to work with Lichfield and the other neighbouring authorities to determine an appropriate level of housing and employment land.	Comments noted. The District Council will continue to work with neighbouring authorities including Walsall Borough Council through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield.
SIO766	Essington Park Ltd (CT Planning)	4	Policies should be amended where there have been changes in circumstances and additional policies should be incorporated to ensure full and proper compliance with the NPPF.	Comments noted.
SIO767	Mike Smith, Walsall Borough Council	15	The GTAA needs to be updated. Any update might identify different needs in respect of the number of pitches required, their preferred locations and their types. We also think it is questionable whether the area West of the A38 around Alrewas should be prioritised for any development other than mineral development for the reasons explained in our response to Question 28 below. Evidence from Birmingham and the Black Country is that there has been a considerable increase in large unauthorised encampments in the last few years. We are currently investigating the reasons for this but it may indicate a need for more sites either for transit use or as permanent residences. We recognise that we have not yet responded to your request in March 2017 to help meet Lichfield's identified needs. We can advise however that, in common with our need for general housing sites, we are having difficulties in identifying traveller sites to meet Walsall's own needs.	Comments noted. The evidence base including the Gypsy Traveller Needs Assessment will be updated for the Local Plan Review.
SIO768	Essington Park Ltd (CT Planning)	7	<p>A policy should be included in the Plan Review that addresses the provision of Roadside Services Areas in the District.</p> <p>Land west of A38/North or Alrewas is well placed to provide a Roadside Service Area. The site is sufficiently large to support car, coach and 24 hour lorry parking, a food outlet, a hotel/overnight accommodation and fuelling points. The site is strategically located adjacent to the A38, central to Lichfield District and its attractions including the nearby National Memorial Arboretum.</p> <p>The provision of an RSA in this location in the District would further assist the diversification of the rural economy and the creation of local jobs. The service area could replace Ivy Garage in Alrewas providing an opportunity to remove HGV traffic from the village and redevelop Ivy Garage.</p>	The Council will give these matters consideration as part of the review, in particular focusing on the requirements arising from the NPPF and NPPG.

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SIO769	Mike Smith, Walsall Borough Council	17	If the retail and office requirements set out within the Local Plan Allocations document are to be used as the basis for the Local Plan Review then Walsall requests that the comments we made in regards to these allocations in response to the Lichfield District Council Local Plan Allocations Focused Changes Consultation are considered as part of this consultation. We also question whether there would not be a need to review the centre use figures after the residential figures and locations have been determined as this might result in a need for further centre uses to support the new homes. The Local Plan Allocations document has a plan period of 2008 – 2029 but this Local Plan Review proposes a plan period of 2020 – 2036. It is therefore not clear from this consultation what the mechanism will be for planning for centres uses floorspace after 2029. The Issues and Options Report refers to the Employment Land Availability Assessment but there appear to be no questions explicitly about the topic of employment land. Question 17 refers to office requirements based upon the Lichfield Centres Study. We agree that offices, within class B1(a) as well as Class A2, should be directed to centres. However, there are several existing commitments for out of centre sites, as reflected in the recently submitted Allocations Document, where B1(a) use is not distinguished from B1(b) or B1(c) on out of centre sites. The future Local Plan, site allocations and planning permissions should ensure B1(a) uses are explicitly excluded from other types of B1 use and from out of centre sites except where specifically justified.	Comments noted. The Local Plan Review will be informed by a range of evidence including an Employment Land Availability Assessment.
SIO770	Mike Smith, Walsall Borough Council	18	No concerns in principle in regards to the development of DPDs for centres, however, we do consider there is a need for an overall general approach towards the amount of retail and office floorspace across the area as a whole in order to ensure issues around demand, catchment areas and market share is given full consideration in the wider context. We therefore suggest that Core Policy 8 is updated for the revised Local Plan to set out the hierarchy of centres with details on each level of centres' scale and function.	Comments noted. This will be considered further as the Local Plan Review progresses
SIO771	Mike Smith, Walsall Borough Council	20	We recognise that it is not the role of the Lichfield District Local Plan to consider 'county matters' as these are already covered in the adopted waste and minerals plans for Staffordshire and Stoke-on-Trent. However, it would be helpful for the plan to acknowledge that existing safeguarded employment areas and proposed new employment areas in Lichfield may be able to accommodate waste management infrastructure.	Comments noted. The District Council will continue to work with Staffordshire County Council through the Duty to Cooperate as the Local Plan Review progresses.
SIO772	Mike Smith, Walsall Borough Council	21 - 37	It is difficult to respond to these questions in the absence of any indication of the scale of development that might be accommodated under each option or in each location. It is possible that a combination of two or more of the options might be appropriate. We would be cautious about using the Greater Birmingham Strategic Growth Study as the basis of identifying areas of search for new development location as the Study was very 'high level'. It might well be that additional locations not identified in the Study could be suitable for large new developments.	Comments noted.
SIO773	Mike Smith, Walsall Borough Council	21	Option 1 cannot be considered fully without regard to housing options in adjacent local authority areas. On Map 8.1 these comprise Rugeley (Cannock Chase District), Brownhills (Walsall), Sutton Coldfield (Birmingham) and Tamworth. Map 9.1 (Option 2) is similar but the Brownhills symbol appears to be incorrectly labelled as 'Norton Canes/ Penkridge' on Map 9.1. We assume this is an error. The 'Brownhills' location identified in the consultation document is identified as Area 11: North of Walsall Around Brownhills (Urban Extension) in the Greater Birmingham Strategic Growth Study (Table 5 and Figure 8), but it is not identified as one of the Urban Extension areas to be taken forward (1.77). Nothing specific is said about this location in Sections 8 and 9 of the consultation document, and it is not clear whether adjacent land in Lichfield forms part of this option. Walsall Council will expect to be consulted on any proposals to take forward this option as an urban extension, including the identification of land adjacent to our boundary in Lichfield District.	Comments noted. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate.
SIO774	Mike Smith, Walsall Borough Council	24	We have commented on the urban extension option identified at Brownhills on the boundary with Walsall under Question 21 and note that this is also included in Growth Option 2 (Map 9.1). With regard to the other options, we think it would be preferable not to identify Fradley and Alrewas because of potential conflicts with minerals policy, unless clear justification can be provided. The Minerals Local Plan for Staffordshire has identified a significant Area of Search for sand and gravel extraction in this location. Any expansion of rural settlements within a minerals safeguarding area will be expected to comply with Policy 3 of the Minerals Local Plan. New housing developments near to areas where mineral extraction is currently taking place or could happen in the future would also have to be planned very carefully, so that potential conflicts can be avoided.	Comments noted.
SIO775	Mike Smith, Walsall Borough Council	26	Fradley and Alrewas are also included in Growth Option 3 (Map 10.1). For the reasons stated in response to Question 24, it would be preferable not to identify these as locations for significant housing growth.	Comments noted.
SIO776	Mike Smith, Walsall Borough Council	28	The consultation document identifies the area 'Around Fradley and Alrewas' as an option for a new settlement under Growth Option 4 (Map 11.1), despite the conclusion of the Strategic Growth Study that it should not be promoted as a favourable option because the area is at significant risk from flooding (11.6). We consider it is likely that this option should be rejected, not only because of the significant flood risk, but also because it is likely to compromise future sand and gravel supply. The Strategic Growth Study was completely silent about minerals, and the SEA Theme 'Use Natural Resources Efficiently' did not cover effects on mineral resources. Consequently, effects on mineral resources and future mineral production were not considered for any of the housing growth areas included in the study. The area 'Around Fradley and Alrewas' identified in orange on Map 11.1 contains sand and gravel resources of strategic importance for the West Midlands. The location identified is also near to a permitted sand and gravel quarry (Whitemoor Haye/ Alrewas) and quarry extension site identified in the Minerals Local Plan. A new settlement in this location is likely to create significant land use conflicts and would compromise the continued supply of sand and gravel from this area to other parts of the West Midlands. For these reasons, we do not consider there is a case so far to support the identification of the 'Around Fradley and Alrewas' area as a location for a new settlement.	Comments noted.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO777	Clifton Campville with Thorpe Constantine Parish Council	9	The Parish Council agree with the Vision for the district. Development should be focused on Town Centres and identified key rural villages.	Comments noted
SIO778	Mike Smith, Walsall Borough Council	31	We note that Fradley is identified in purple as an 'Existing Employment Area' for potential expansion under Growth Option 1 (Map 12.1). Any significant expansion of the employment area at Fradley would need to be carefully planned to avoid compromising the Area of Search for sand and gravel extraction identified in the Minerals Local Plan for Staffordshire. For the reasons stated above, we would not support the designation of an employment expansion area within the Area of Search without adequate provision to safeguard the sand and gravel resources in this area, to ensure that working of these resources can continue and will contribute appropriately towards national and regional requirements.	Agreed- District councils should show Mineral Safeguarding Areas on their policy maps. The Council will have regard to the local minerals plan when identifying suitable areas for non-mineral, including expansion of existing employment location, development in this Local Plan.
SIO779	Clifton Campville with Thorpe Constantine Parish Council	26	The Parish Council disagree with the Rural Growth Option for disbursed development. A hierarchy of growth should be established whereby growth is directed to the most sustainable locations. Clifton Campville does not have the infrastructure to support significant growth and is remote from existing key villages and towns. The Rural Settlement Sustainability Study 2016 indicates that the village has poor accessibility and classed as isolated. Growth in this location, above that of parish need and small infill as identified in the Parish Plan, would be unsustainable due to the heavy reliance on car travel and limited opportunities for access to the workplace.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO780	Mike Smith, Walsall Borough Council	2	Appendix A - With regard to the Cannock Extension Canal SAC - Natural England have drafted a Site Improvement Plan for the canal. Any new HRA and / or other assessment work should pick up all aspects of the Site Improvement. Appendix B - This will need to be reviewed to take account of the responses to questions 5 to 7. Glossary - various amendments to definitions.	Comments noted
SIO781	Clifton Campville with Thorpe Constantine Parish Council	27	The Parish Council do not support the growth option north of Tamworth at Thorpe Constantine. Para 11.7 suggests that development at Thorpe would use Tamworth as a 'Hub' to provide facilities and services. Thorpe Constantine is not considered 'relatively close' to Tamworth being some 4 miles distant to the very edge of the town boundary. A new settlement would need to be self - sustaining due to the remote location and thus potentially reversing the service requirements whereby there is a draw of people from Tamworth to a more desirable location heavily reliant on the car. There is no public transport available to Tamworth from Thorpe Constantine. Any commuting by car to Tamworth for employment and services from a new settlement would be significantly constrained by the facilities available for parking within Tamworth itself, especially by the station which is regularly full by 8.00am. This will be further exacerbated by the requirements of the residential development recently approved at Arkall Farm to the north of Tamworth. The infrastructure within Tamworth is not sufficient to service the requirements of a new settlement. The Staffordshire Minerals Local Plan 2015-2030 Policy 3 shows Thorpe Constantine is located within a Minerals Safeguarding Area restricting non-minerals development within the area unless specific criteria are met i.e. prior extraction. Development of this land would therefore undermine the Minerals Plan Policy and sterilise the land for minerals working. A large proportion of the site is located within the River Mease water catchment area which is a Special Area of Conservation. This designation restricts development unless it can be shown that the development will not cause significant harm. No evidence has been provided to indicate this is the case. It is also noted that Thorpe Constantine does not appear within previous evidence base documents or the SHLAA. An Area north of Tamworth has been suggested by the Birmingham Strategic Growth Study however this does not appear to take into account the environmental constraints highlighted. Without an Appropriate Assessment, Thorpe Constantine should not be considered within the plan for a new settlement.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO782	Home Builders Federation (Sue Green)	1	It is agreed that the proposed plan period of 2020 – 2036 for the new Local Plan is appropriate. This timeframe should provide a period of at least 15 years after the adoption date of the new Local Plan. The National Planning Practice Guidance (NPPG) advises that plan dates should be co-ordinated therefore the proposed timeframe should also be aligned with the plan periods of other Greater Birmingham Housing Market Area (HMA) authorities.	Comments noted

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO783	Lichfields on behalf of the National Memorial Arboretum	Whole Document	<p>The NMA welcomes the continued support set out for the Arboretum. Particularly, it is encouraged by reference to the significance of the Arboretum within the tourism sector in Lichfield (para 2.30), and to the potential for expansion of the site following ongoing restoration of the mineral site on which it is located (para 2.37). As has been noted to the Council before, it is crucial for the NMA to create long-term sustainable income streams to support remembrance and for the Arboretum to become self-sustaining in 3-5 years. Continued policy support will help the NMA achieve these aims.</p> <p>One area identified as a potential growth option is land 'Around Fradley and Alrewas' (Option 4). The NMA is concerned regarding the potential for land surrounding the NMA to accommodate residential development given the harmful effect such development would have on both the setting of, and visitor experience to, the NMA. It is acknowledged that the location and its relative remoteness from built development plays a crucial part in the setting of the NMA.</p> <p>The NMA is keen to ensure that any surrounding development does not detract from the character of the facility, nor does it impact on the visitor experience of the NMA and its remembrance function. It considers that any allocation for new housing development to the south of the site would potentially cause significant harm to the successful operation of the NMA. This option was not one favoured within the Strategic Growth Study due to a lack of infrastructure, flood risk and minerals extraction policies. Given the above, the NMA wishes to advice of its objection to the land 'Around Fradley and Alrewas'.</p>	Comments noted.
SIO784	Church Commissioners (Stacey Green for Barton Willmore)	whole Document	<p>This representation provides the views of the Commissioners in relation to policy options presented through this consultation and is made with reference to the Commissioners land interests located within the District at Land west of Ironstone Road and Land West of Stables Way, Burntwood (Site Location Plan submitted in Appendix 1).</p> <p>The Council's decision to review the Local Plan now is supported by the Commissioners. The Commissioners have previously made representations to the Lichfield District Local Plan Allocation – Open Consultation in October 2016 and the Local Plan Allocations Document ("the Allocations DPD") in May 2017. This representation builds upon the comments previously made to the Council in response to the Allocations DPD and responds only to the questions considered relevant to the Commissioners' interests within this consultation paper.</p> <p>The Commissioners broadly welcome the proposed plan period, vision and objectives of the Local Plan. The Commissioners also agree with the list of policies requiring major review and the key issues to be considered and addressed by policies. As part of this review of the Local Plan, the Council should seek to update its evidence supporting the plan. This should include an update of its Strategic Housing Market Assessment (SHMA), Strategic Housing Land Availability Assessment (SHLAA)/Urban Capacity Assessment, and Green Belt Review. Updates to the SHMA and SHLAA are required in order for the Council to fully understand its objectively assessed housing need and understand their land supply position / requirement for further sites beyond the urban area.</p> <p>The Commissioners object to the application of a specific district wide density policy. The density of a development should be based on good design principles, applied in accordance with the character of the site and its surroundings rather than being set at a district level. Its adoption may lead to inappropriate development harmful to the built character of the District.</p> <p>The Commissioners welcome the commitment made by the Council to meet some of the unmet housing needs arising from the Greater Birmingham Housing Market Area. Whilst a City Region wide strategy for responding to this unmet need has yet to be resolved, the Commissioners consider that the Council should proactively plan to meet a proportion of this based on migration/commuting data of links to the conurbation.</p> <p>Option 1 provides for the most sustainable and suitable approach to meeting housing needs over the plan period as illustrated by the Council's SA. The concentration of new growth at the main towns of the District, will reduce significantly the need for new infrastructure and facilities required to service new developments, and reduce the need to travel by car in accessing services, shops and sources of employment. The siting of development at the main towns of the District will also ensure that new development is delivered closest and is therefore most responsive to the source of the District's housing need.</p> <p>In response to the Local Plan Review and evidence of the need for further allocations, the Commissioners submit their land interests at Land west of Ironstone Road and Land West of Stables Way, Burntwood. Collectively the sites have the ability to deliver approximately 375 dwellings within the plan period. The sites provide developable and deliverable locations for housing. The sites are well related to the built-up edge of Burntwood and are in a sustainable location accessible to most services and facilities by foot. The Commissioners do not consider that either site fulfils a strong Green Belt function, and the purposes of the wider Green Belt would not be comprised should either or both sites be released for housing development.</p> <p>The Commissioners wish to be kept informed on future progress on this Plan.</p>	Comments noted. The evidence bases cited are to be reviewed as stated in the consultation document.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO784	Church Commissioners (Stacey Green for Barton Willmore)	whole Document	<p>This representation provides the views of the Commissioners in relation to policy options presented through this consultation and is made with reference to the Commissioners land interests located within the District at Land west of Ironstone Road and Land West of Stables Way, Burntwood (Site Location Plan submitted in Appendix 1).</p> <p>The Council's decision to review the Local Plan now is supported by the Commissioners.</p> <p>The Commissioners have previously made representations to the Lichfield District Local Plan Allocation – Open Consultation in October 2016 and the Local Plan Allocations Document ("the Allocations DPD") in May 2017. This representation builds upon the comments previously made to the Council in response to the Allocations DPD and responds only to the questions considered relevant to the Commissioners' interests within this consultation paper.</p> <p>The Commissioners broadly welcome the proposed plan period, vision and objectives of the Local Plan. The Commissioners also agree with the list of policies requiring major review and the key issues to be considered and addressed by policies.</p> <p>As part of this review of the Local Plan, the Council should seek to update its evidence supporting the plan. This should include an update of its Strategic Housing Market Assessment (SHMA), Strategic Housing Land Availability Assessment (SHLAA)/Urban Capacity Assessment, and Green Belt Review. Updates to the SHMA and SHLAA are required in order for the Council to fully understand its objectively assessed housing need and understand their land supply position / requirement for further sites beyond the urban area.</p> <p>The Commissioners object to the application of a specific district wide density policy. The density of a development should be based on good design principles, applied in accordance with the character of the site and its surroundings rather than being set at a district level. Its adoption may lead to inappropriate development harmful to the built character of the District.</p> <p>The Commissioners welcome the commitment made by the Council to meet some of the unmet housing needs arising from the Greater Birmingham Housing Market Area. Whilst a City Region wide strategy for responding to this unmet need has yet to be resolved, the Commissioners consider that the Council should proactively plan to meet a proportion of this based on migration/commuting data of links to the conurbation.</p> <p>Option 1 provides for the most sustainable and suitable approach to meeting housing needs over the plan period as illustrated by the Council's SA. The concentration of new growth at the main towns of the District, will reduce significantly the need for new infrastructure and facilities required to service new developments, and reduce the need to travel by car in accessing services, shops and sources of employment. The siting of development at the main towns of the District will also ensure that new development is delivered closest and is therefore most responsive to the source of the District's housing need.</p> <p>In response to the Local Plan Review and evidence of the need for further allocations, the Commissioners submit their land interests at Land west of Ironstone Road and Land West of Stables Way, Burntwood. Collectively the sites have the ability to deliver approximately 375 dwellings within the plan period. The sites provide developable and deliverable locations for housing. The sites are well related to the built-up edge of Burntwood and are in a sustainable location accessible to most services and facilities by foot. The Commissioners do not consider that either site fulfils a strong Green Belt function, and the purposes of the wider Green Belt would not be comprised should either or both sites be released for housing development.</p> <p>The Commissioners wish to be kept informed on future progress on this Plan.</p>	Land West of Stables Way, Burntwood is in Green Belt outside the settlement boundary.
SIO785	Home Builders Federation (Sue Green)	2	<p>Agree that the Councils supporting evidence as set out in Appendix A should be renewed and updated. Any updating of evidence should be undertaken in the context of the Governments proposed changes to the NPPF and the NPPG including the preparation of Statements of Common Ground, the standardised methodology for the calculation of objectively assessed housing needs (OAHN), Green Belt Review, the housing delivery test and whole plan viability assessment. The Council's supporting evidence should also accord with the proposed plan period of 2020 - 2036.</p>	Comments noted

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO786	Home Builders Federation (Sue Green)	3	<p>The LPR should be prepared on the basis of joint working on cross boundary issues such as where housing needs cannot be wholly met within individual authorities. It is agreed that meeting unmet housing needs which occur in the Greater Birmingham HMA is a cross boundary matter. To fully meet the legal requirements of the Duty to Cooperate the Council should engage on a constructive, active and on-going basis with the other Greater Birmingham HMA authorities to maximise the effectiveness of plan making. One key outcome from co-operation between the Greater Birmingham HMA authorities should be the meeting of OAHN in full across the HMA.</p> <p>The Council should not sign any unilateral Memorandum of Understanding for contributions towards meeting unmet needs which provide no certainty that the overall combined sum of unilateral agreements will meet the unmet needs in full of the HMA. The new Lichfield Local Plan should avoid any ambiguity or confusion by explicitly setting out the quantum of unmet needs from each respective neighbouring authority (Tamworth, Cannock Chase, Birmingham and Black Country) to be met.</p> <p>By the time of the submission of the new Lichfield Local Plan for Examination the Government's standard methodology for the calculation of OAHN will have been implemented. Using this standardised methodology the OAHN for Lichfield is 340 dwellings per annum which is less than the adopted Local Plan housing requirement. However the standard methodology is only a minimum starting point. Any ambitions to support economic growth, to deliver affordable housing and to meet unmet housing needs from elsewhere are not negated by this lower figure. The Government's objective of significantly boosting the supply of homes remains. It is important that meeting housing needs is not underestimated or undermined.</p>	Comments noted
SIO787	Mark Weller	35	Branston	Comment noted.
SIO788	Church Commissioners (Stacey Green for Barton Willmore)	1	Support. A timeframe of 2020 to 2036 will provide a plan period which is in excess of 15 years. This is consistent with Paragraph 157 of the NPPF which establishes crucial requirements for Local Plans. Included within this list is the requirement for an appropriate time scale, preferably a 15 year time horizon. We would request that the plan period is at least 15 years post adoption of the Plan to ensure sufficient timescales for the implementation of policy and the achievement of plan vision and objectives. The conclusion of the plan period in 2036 is appropriate as this aligns with the period of assessed housing needs as outlined within the Strategic Housing/Growth Study for the Greater Birmingham Housing Market Area (February 2018) which underpins spatial planning within Greater Birmingham.	Comments noted
SIO789	Mark Weller	25	<p>No. The Shenstone Area New Settlement should be omitted as it is: -</p> <p>(a) A village of significant beauty, with a lot of ancient and interesting history. The character of the village would be damaged by the proposed growth and the visitor numbers would no doubt decline.</p> <p>(b) The new settlement option would endanger the environment and destroy the homes for a significant amount of wildlife who live within the Green Belt.</p> <p>(c) The new settlement option would have a detrimental impact on the close knit and supportive community, as the growth would mean that Shenstone would be so large it would be difficult for the community to remain the same. Many in the village have had families here for generations and would be devastated by the significant change to the village with a new settlement option.</p> <p>(d) Shenstone is already very congested for such a small village so any new settlement would require significant infrastructure investment which would significantly alter the character of the village. Other established urban areas are more sustainable. Shenstone station could not support any significantly increased passenger volumes given parking issues. The road network around the village is also poor and could not support an increase in traffic. Greysbrooke school is already a popular school and could not support the levels of growth that would occur with a new settlement option.</p> <p>(e) The Green Belt surrounding Shenstone is exceptional farm land and once gone it could not be returned back to its former glory. With the move to Brexit, it may be more necessary than ever for the UK to produce its own food within the country.</p> <p>(f) The only new settlement option of three in the Green Belt;</p> <p>(g) Is the only new settlement option breaching the safeguarding from encroachment policy;</p> <p>(h) Is the only new settlement option breaching Strategic Separation policy</p> <p>(i) Is the only new settlement option breaching Local Separation policy.</p> <p>These are designations made clear in the GBHMA, there is no reference or impact assessment of these designations in the LDC review. The credibility of the Birmingham Growth Study assertion that a new settlement around Shenstone would have "good access to public transport" because it would be 1km (0.6 miles) from the nearest rail station to Birmingham, must also be challenged. The challenge must be made on the accuracy of the distance assumed and station capacity. The assertion is made as part of a Venn diagram in the Growth Study.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
			<p>The Council should take the opportunity to update its existing evidence base as far as practical. Updated studies should be progressed to understand the housing land supply and opportunities for development within the District which are available, deliverable and achievable by 2036. This will provide the Council with a refreshed view of capacity within the District and the additional land necessary to meet its assessed housing and employment. The Council should update its Housing Needs Study & Strategic Housing Market Assessment, May 2012 given the changes emerging in respect of the policy context. The Government are proposing changes to national planning policy as consulted upon through the Draft revisions to the National Planning Policy Framework (Draft NPPF). This includes adopting a standardised approach for assessing housing need as set out by the Government previously through its "Planning for the right homes in the right places" consultation of September 2017. The Standardised Methodology would establish the baseline position for housing need but would not include any allowance for housing which is responsive to economic growth aspirations. As such, where justified, local planning authorities may plan for a level of housing growth which is in excess of the implied requirement of the Standardised Assessment. The 2016-based ONS Sub National Population Projections (SNPP) were also released on 24th May 2018. These projections will underpin ONS 2016-based household projections to be published in September 2018. These will then replace the existing 2014-based household projections. The household projections form the starting point estimate of OAN under the existing Planning Practice Guidance. They will also underpin stage 1 of the proposed standardised methodology for calculating local housing need, if it is adopted as proposed by Government. For these reasons the 2016-based SNPP and the subsequent 2016-based household projections should be taken into account in understanding the housing needs of the district for the plan period. As part of this Local Plan review, the Council must update its Green Belt Assessment. Around half of Lichfield District is designated as Green Belt. The Green Belt constrains the growth of many settlements within the District including Burntwood, which is one of the largest and most sustainable settlements in the District. As a result, to enable further development at Burntwood and provide for a sustainable pattern of development, a review of the Green Belt is required.</p> <p>This is common with the findings of the Inspector of the Local Plan Strategy which set out: "When reviewing Green Belt boundaries account should be taken of the need to promote sustainable patterns of development, or to put it another way, that the revised boundaries should be consistent with the Local Plan Strategy for meeting the requirements for sustainable development (Lichfield District Local Plan: Strategy, Paragraph 191)"</p> <p>The Commissioners are aware that as part of the Council's preparation of the Allocations DPD, a review of the Green Belt has been conducted. However, this Review did not include an assessment of our Client's land interest at Land west of Ironstone Road and Land West of Stables Way, Burntwood despite both sites being free from any ecological, landscape or historical designation. As such the current Green Belt Review does not provide for a comprehensive assessment of the Green Belt, and its conclusions cannot be relied upon in evaluating the responsiveness of designated land to the Green Belt purposes and suitability for release for development.</p>	
SIO790	Church Commissioners (Stacey Green for Barton Willmore)	2		Consideration to undertaking a HEDNA will be undertaken
SIO791	Mark Weller	12	Be clear what housing is to assist GBHMA each year.	Comments noted, consideration of a Green Belt Review will be undertaken
SIO792	GVA on behalf of Metacre Ltd	Whole Document	Promotion of land at Bleak House Farm, Burntwood, for housing. The site extends to approximately 29ha. The buildings associated with Bleak House Farm occupy land in the south west corner of the site. The remainder of the site is open and undeveloped and used for grazing, haylage and a small amount of crop production. The site is in single ownership and is suitable, available and achievable. Further technical assessments will be submitted to the council in time for them to be considered ahead of the Council's deliberations in respect of its Preferred Options. That said, on the basis of some preliminary calculations, we would expect the site to be capable of delivering at least 700 dwellings. Of course, the capacity of the site could be greater and, for sustainability reasons, we will be looking at ways and means of ensuring that the site makes as meaningful a contribution to the District's housing land supply as possible.	Site is outside current settlement boundary but is adjacent to sustainable settlement of Burntwood and in close proximity to services and facilities. Lack of public transport in this location. Within Green Belt. Does not wholly comply with current development plan policies in the Local Plan, however, site falls within broad area for search for assessment of sites which could contribute to sustainable mixed communities. Further investigation of Coal Subsidence area may be required. Site is within mineral safeguarding area. Electricity line crosses the site. Loss of Grade 3 Agricultural Lane may need justification. Site falls within the FOM and contributions to these projects may be required. Site has potential for protected species. An SSSI and BAS are within 1km and the impact on it may need further investigation. Site is within the Cannock Chase zone of influence therefore mitigation may be required.
SIO793	Mark Weller	9	Yes, as none of the key settlement visions includes excessive growth.	Comments noted.
SIO794	Mark Weller	8	Need to look in more detail at the needs of Lichfield District.	Assessment of Lichfield Districts needs will be undertaken
SIO795	Mark Weller	3	No. We need to be able to more clearly see what other options are outside of the Lichfield area.	Lichfield District forms part of the Greater Birmingham and Black Country Housing Market Area. As part of the duty to co-operate the Council has committed to engaging with its neighbours to meet the needs within the HMA.
SIO796	Church Commissioners (Stacey Green for Barton Willmore)	3	Support the reference and commitment to engage with neighbouring Council's to meet a portion of the identified unmet needs arising from the Greater Birmingham HMA. It is acknowledged that the unmet needs of Birmingham and the Black Country have yet to be distributed amongst the authorities which make up the Greater Birmingham Housing Market Area. The exact percentage of unmet housing need to be met in the case of Lichfield should be based on an assessment of commuting and migration patterns with the conurbation. A proactive approach would assist in meeting the shortfall and help minimise pressure on the local housing market.	Comments noted.
SIO797	Mark Weller	2	It would be helpful to understand the requirements in Lichfield district and as a separate figure what Birmingham need.	Lichfield District forms part of the Greater Birmingham and Black Country Housing Market Area. As part of the duty to co-operate the Council has committed to engaging with its neighbours to meet the needs within the HMA.
SIO798	Mark Weller	1	15 years goes very quickly, so a longer period, even 20 years would give more of a break between consultations.	Comments noted.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO799	Church Commissioners (Stacey Green for Barton Willmore)	4	Agree with the list of policies which are set out in Table 1.2 of the consultation document. A review of the Spatial Strategy is necessary to ensure that new development is focussed to those settlements which are most sustainable, and which need further growth to supplement their vitality and vibrancy. Housing needs of the plan area (and those which are outstanding for areas beyond) are so significant that the releases from the Green Belt will be necessary. As a result, in order to secure the delivery of housing needs in full, sustainable settlements constrained by the Green Belt will need to grow over the plan period. A review of the Housing Delivery policy is necessary on account of updated housing needs and to respond to the unmet needs of surrounding authorities including Birmingham and the Black Country. There is a need for the Affordable Housing policy to be updated ensure that it is most effective in responding to the affordable housing needs of the District and reflects Government policy. No affordable housing should be sought on sites of less than 10 dwellings. The policy should also be amended to make reference to the role of Starter Homes in meeting affordable housing need. A revised policy relating to development in Burntwood is necessary. This will set out the required amount of development for the town over the plan period and allocate sites to meet this need.	The revised NPPF will need to be considered through the Local Plan Review process
SIO800	GVA on behalf of Metacre Ltd	1	We note that the Council hopes to be able to conclude the Local Plan Review process, and adopt a revised Plan, by the end of 2020. Accordingly, 2020 - 2036 is the minimum time frame that the Council should be looking to plan for. Indeed, if, for whatever reason, it encounters slippage or new evidence becomes available which looks beyond 2036, it may be necessary or appropriate to extend the Plan period beyond that date.	Comments noted.
SIO801	Church Commissioners (Stacey Green for Barton Willmore)	7	New policies will be required for any new strategic sites which are allocated through the Local Plan Review. The Council should define a number of reserve sites, which, in the case of a shortfall in housing supply, will be released for development to ensure that a five-year supply can be maintained throughout the plan period and that development requirements can be met in full. This is important given the proportion of the District which is designated Green Belt, and where housing development would normally be considered inappropriate in national planning policy terms.	Comments noted, the approach to delivering growth will be considered as part of the Review
SIO802	GVA on behalf of Metacre Ltd	2	<p>It is likely that large parts of the Council's evidence base will need to be revisited or updated for the purposes of the Local Plan review. The key parts of the evidence base that need updating are those in respect of housing and employment development needs, the Green Belt, infrastructure requirements and the feasibility / viability of delivering these, affordable housing viability, the role of Cannock Chase SAC and sustainability.</p> <p>Metacre have concerns regarding the Greater Birmingham HMA Strategic Growth Study and welcome the Council's commitment to consider all reasonable options (not just those identified in the study). The key concerns with the study are, the focus on the minimum level of housing needed in the Region, in spite of identifying compelling reasons for delivering significantly more than the minimum; the assumptions about windfalls, the assumptions that they have made about the ability of the HMA authorities to deliver more housing on already identified sites by increasing densities appear optimistic; the assessment of land beyond the Green Belt is very basic and the Green Belt review is at best very basic and at worst seriously flawed.</p> <p>The Council will need to produce, and keep up to date throughout the plan-making process, a new Sustainability Appraisal. It should take care to consider whether certain measures of sustainability should be afforded more weight in the overall planning balance (e.g. because they are more important / significant and deliver more economic, social or environmental gains than other measures). The Appraisal should also factor in the ability of the Council and developers to mitigate adverse impacts.</p>	<p>Comments noted evidence on the SAC will be considered.</p> <p>HRA will need to be undertaken at each stage of the Plan</p> <p>Consideration to undertaking a HEDNA will be undertaken</p> <p>SA will be required to accompany the Review document</p>
SIO803	Church Commissioners (Stacey Green for Barton Willmore)	8	Support the Issues listed in Table 3.1 of the Plan to be considered through the Local Plan Review. Note and welcome that housing supply/delivery issues occupy the first three issues outlined. This demonstrates the prominence and importance of this matter to be addressed through the Local Plan Review.	Comments noted.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO804	Home Builders Federation (Sue Green)	12	<p>The LPR should be prepared on the basis of joint working on cross boundary issues such as where housing needs cannot be wholly met within individual authorities. It is agreed that meeting unmet housing needs which occur in the Greater Birmingham HMA is a cross boundary matter. To fully meet the legal requirements of the Duty to Cooperate the Council should engage on a constructive, active and on-going basis with the other Greater Birmingham HMA authorities to maximise the effectiveness of plan making. One key outcome from co-operation between the Greater Birmingham HMA authorities should be the meeting of OAHN in full across the HMA.</p> <p>The Council should not sign any unilateral Memorandum of Understanding for contributions towards meeting unmet needs which provide no certainty that the overall combined sum of unilateral agreements will meet the unmet needs in full of the HMA. The new Lichfield Local Plan should avoid any ambiguity or confusion by explicitly setting out the quantum of unmet needs from each respective neighbouring authority (Tamworth, Cannock Chase, Birmingham and Black Country) to be met.</p> <p>By the time of the submission of the new Lichfield Local Plan for Examination the Government's standard methodology for the calculation of OAHN will have been implemented. Using this standardised methodology the OAHN for Lichfield is 340 dwellings per annum which is less than the adopted Local Plan housing requirement. However the standard methodology is only a minimum starting point. Any ambitions to support economic growth, to deliver affordable housing and to meet unmet housing needs from elsewhere are not negated by this lower figure. The Government's objective of significantly boosting the supply of homes remains. It is important that meeting housing needs is not underestimated or undermined.</p>	Comments noted. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This will include the consideration of the housing requirement for the District.
SIO805	Church Commissioners (Stacey Green for Barton Willmore)	11	National planning policy seeks to encourage the effective use of land and that proposed changes to the NPPF seek the introduction of density requirements within Local Plans. Yet despite this, the Commissioners do not support the notion of an overarching density policy within the Local Plan Review. Density is a key component of urban design and should not be dictated by an overarching policy but rather the character of the site and its relationship to the wider surrounding area. It may not always be appropriate for reasons of amenity, visual impact and / or heritage for sites within an urban context to be built to a high density. In response, policy should be flexible towards density allowing for variation in design and to ensure that new development is compatible with its surroundings whilst making best use of the site.	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO806	Home Builders Federation (Sue Green)	4	It is agreed that existing policies as set out in Appendix B should be either replaced, amended or not changed accordingly. The review of any policy in the new Local Plan should be undertaken in accordance with the Government's proposed changes to both the NPPF and NPPG.	Comments noted.
SIO807	Church Commissioners (Stacey Green for Barton Willmore)	12	Welcome the commitment made by the Council to meet a proportion of the unmet need arising from within the GBHMA. This commitment should be reflected within the Local Plan Review. A proportion of the unmet needs of the GBHMA should be met now based on an assessment of the migration and commuting links between the District and the conurbation.	Comments noted.
SIO808	Home Builders Federation (Sue Green)	5	It is agreed that existing policies as set out in Appendix B should be either replaced, amended or not changed accordingly. The review of any policy in the new Local Plan should be undertaken in accordance with the Government's proposed changes to both the NPPF and NPPG.	The revised NPPF will need to be considered through the Local Plan Review process
SIO809	Home Builders Federation (Sue Green)	6	It is agreed that existing policies as set out in Appendix B should be either replaced, amended or not changed accordingly. The review of any policy in the new Local Plan should be undertaken in accordance with the Government's proposed changes to both the NPPF and NPPG.	Agreed that the revised NPPF will need to be considered through the Local Plan Review process
SIO810	Home Builders Federation (Sue Green)	7	It is agreed that existing policies as set out in Appendix B should be either replaced, amended or not changed accordingly. The review of any policy in the new Local Plan should be undertaken in accordance with the Government's proposed changes to both the NPPF and NPPG.	Comments noted.
SIO811	Home Builders Federation (Sue Green)	8	It is agreed that the fourteen listed main issues, the vision and strategic priorities set out in the adopted Local Plan remain relevant.	Comments noted.
SIO812	Home Builders Federation (Sue Green)	9	It is agreed that the fourteen listed main issues, the vision and strategic priorities set out in the adopted Local Plan remain relevant.	Comments noted
SIO814	Home Builders Federation (Sue Green)	10	It is agreed that the fourteen listed main issues, the vision and strategic priorities set out in the adopted Local Plan remain relevant.	Comments noted
SIO815	GVA on behalf of Metacre Ltd	3	We are satisfied that the Council has identified all key strategic cross boundary issues.	Comments noted

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO816	GVA on behalf of Metacre Ltd	4	Agree that the policies listed within Table 1.2 need to be significantly amended or replaced. In the light of the fact that, in the decision-making context, the development plan must be read as a whole (i.e. all policies within it have the potential to be relevant in any given instance), the Council should consider whether there are opportunities to combine some of its Core and Development Management Policies to avoid / reduce overlap and repetition.	Comments noted
SIO817	Home Builders Federation (Sue Green)	11	<p>The HBF is supportive of the efficient use of land. It is appropriate to encourage the development of higher densities in suitable locations such as those benefiting from good public transport connections. However a "blanket" approach to increasing density across all or most areas should be applied with caution because it is unlikely to provide a variety of typologies to meet the housing needs of different groups.</p> <p>The Council should not under-estimate the challenge of encouraging households other than a transient population focussed on students and young professionals to embrace urban living in high density developments.</p> <p>The inter-relationship between density, house size, house mix and developable acreage on viability should also be carefully considered especially if future development is located in less financially viable areas.</p>	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO818	GVA on behalf of Metacre Ltd	5	We agree that the policies listed within Table 1.3 require minor amendments. As indicated in our response to Question 4, the Council should also take this opportunity to combine Core and Development Management Policies where possible.	Comments noted
SIO819	GVA on behalf of Metacre Ltd	6	We agree that the Policies listed in Table 1.4 do not need to be changed.	Comments noted
SIO820	GVA on behalf of Metacre Ltd	7	Additional policies are not required.	Comments noted
SIO821	GVA on behalf of Metacre Ltd	8	We are satisfied that the Council has identified the main issues facing the District except, the issues facing Burntwood which are significant and require a bespoke vision and strategy; and the need to review the Green Belt boundaries and the need to release land from the Green Belt for development, which warrants a standalone reference.	<p>A Green Belt Review will be undertaken.</p> <p>Consideration to specific vision for Burntwood will be undertaken</p>
SIO822	GVA on behalf of Metacre Ltd	9	The vision remains broadly relevant but the approach set out in the Local Plan (i.e. the spatial strategy) will need to be revised / up dated as indicated elsewhere in these representations. In addition, the vision should place a greater emphasis on the importance of delivery.	Agreed that delivery is an issue despite the Council granting permissions in excess of the housing requirement. There is an onus on the development industry to build out their permitted sites.
SIO823	GVA on behalf of Metacre Ltd	10	We agree that the Strategic Priorities remain broadly relevant.	Comments noted
SIO824	GVA on behalf of Metacre Ltd	11	Yes the Council should consider including a density policy. However, care should be taken to ensure that the Policy allows for developers to design schemes that are appropriate to their context. It would not be sound for the Council to apply a blanket minimum density across all development sites in the District, or even to include a Policy that takes a standardised approach to urban and rural settings, or 'in' and 'edge of' settlement locations.	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO826	GVA on behalf of Metacre Ltd	12	<p>Lichfield is well placed to accommodate a significant element of Birmingham's unmet need. However, contrary to the findings of the Strategic Growth Study, the Council should be looking to satisfy the unmet needs arising from the conurbation in locations that are close to where the need arises. This is not beyond the Green Belt.</p> <p>As indicated above, we consider that the authors of the Strategic Growth Study have significantly underestimated the scale of unmet need across the HMA and so we would urge caution when the Council attempts with its partners to calculate the quantum of development that should be accommodated within the District.</p>	Comments noted. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This will include the consideration of the housing requirement for the District.
SIO827	Home Builders Federation (Sue Green)	13	<p>If the Council wishes to promote self / custom build it should do so on the basis of evidence of need. The Council should assess such housing needs in its SHMA work as set out in the NPPG (ID 2a-021) collating from reliable local information (including the number of validated registrations on the Council's Self / Custom Build Register) the demand from people wishing to build their own homes. The HBF is supportive of proposals to encourage self / custom build for its potential contribution to overall housing supply.</p> <p>However the HBF is not supportive of proposals to seek a proportion of self / custom build plots on all or certain sized residential development sites. This approach only changes housing delivery from one form of house building company to another without any consequential additional contribution to boosting housing supply.</p>	Comments noted. This will be considered further as the Local Plan Review progresses and will be informed by a range of evidence.
SIO828	CPRE - (Susan Kneill-Boxley)	23	New housing in the Green Belt on Greenfield land appears to be included in 9,10, and 11(i.e. in three of the four options). We are opposed to these options due to the unjustified loss of Green Belt.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO829	CPRE - (Susan Kneill-Boxley)	26	New housing in the Green Belt on Greenfield land appears to be included in 9,10, and 11(i.e. in three of the four options). We are opposed to these options due to the unjustified loss of Green Belt.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO830	CPRE - (Susan Kneill-Boxley)	28	New housing in the Green Belt on Greenfield land appears to be included in 9,10, and 11(i.e. in three of the four options). We are opposed to these options due to the unjustified loss of Green Belt.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.

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SIO831	CPRE - (Susan Kneill-Boxley)	31	We are opposed to these options due to the unjustified loss of Green Belt	Comments noted but Strategic policies should establish the need for any changes to Green Belt boundaries and the requirement from the latest ELAA would be considered an established need. This has yet to be updated for this Plan up to 2036 and therefore cannot yet be unjustified, or justified.
SIO832	CPRE - (Susan Kneill-Boxley)	Whole Document	<p>We note with concern that National and Local Policy on the protection of the Green Belt has apparently not been considered in option formulation.</p> <p>General Comments and Representations</p> <p>The document seems to reflect a major change in approach and direction by Lichfield Council - with no justification given in the document. We are surprised and disappointed by Lichfield's approach as they have previously given weight to the protection of the Green Belt. This is a matter on which our fundamental concern at this point and a such a major flaw in the approach taken by Lichfield Council that the 'Local Plan Review - Scope, Issues & Options' document should be reconsidered in its entirety - and that this should be a key element of Committee's deliberation.</p> <p>Note:-</p> <p>Your Council says that it is the first stage of a review of the existing Local Plan (which is not yet fully adopted) yet it may be more accurately described as a new Local Plan. Suggesting that it is a review seems to us to be a little confusing. We acknowledge that there may be reasons for them doing it in this way and would ask that this be explained and clarified.</p>	<p>In accordance with paragraphs 31-33 of the Revised NPPF, any Local Plan has existing policies and these need to be reviewed, it is not a new start. Paragraph 4.6 of the Strategy Adopted 17 February 2015 stated that; "Following discussions falling under the Duty to Cooperate Lichfield District Council recognises that evidence is emerging to indicate that Birmingham will not be able to accommodate the whole of its new housing requirements for 2011-31 within its administrative boundary and that some provision will need to be made in adjoining areas to help meet Birmingham's needs. ..Lichfield District Council will work collaboratively with Birmingham, Tamworth and other authorities and with the GBSLEP to establish, objectively, the level of long term growth through a joint commissioning of a further housing assessment and work to establish the scale and distribution of any emerging housing shortfall. In the event that the work identifies that further provision is needed in Lichfield District, an early review or partial review of the Lichfield District Local Plan Strategy 2015 will be brought forward to address this matter. Should the matter result in a small scale and more localised issue directly in relation to Tamworth then this will be dealt with through the Local Plan Allocations document."</p>
SIO833	Home Builders Federation (Sue Green)	14	<p>If the Council wishes to promote self / custom build it should do so on the basis of evidence of need. The Council should assess such housing needs in its SHMA work as set out in the NPPG (ID 2a-021) collating from reliable local information (including the number of validated registrations on the Council's Self / Custom Build Register) the demand from people wishing to build their own homes. The HBF is supportive of proposals to encourage self / custom build for its potential contribution to overall housing supply.</p> <p>However the HBF is not supportive of proposals to seek a proportion of self / custom build plots on all or certain sized residential development sites. This approach only changes housing delivery from one form of house building company to another without any consequential additional contribution to boosting housing supply.</p>	Comments noted. This will be considered further as the Local Plan Review progresses and will be informed by a range of evidence.
SIO834	Home Builders Federation (Sue Green)	21	<p>The inter relationship between the new Lichfield Local Plan and the Greater Birmingham & Black Country HMA Strategic Growth Study should be transparent. The distribution strategy of the Strategic Growth Study identifies six areas of search in Lichfield. Of the four identified Residential Growth Options it is unlikely that any one Option could meet the housing needs of the District and unmet needs from elsewhere in the HMA. Not all housing needs can be met via brownfield and infill development. Associated risks with an over reliance on brownfield and infill sites because as a finite resource the availability of such sites will decline over time. Furthermore the artificial constraint of housing on greenfield sites will not ensure delivery of unviable brownfield sites nor will it assist with the delivery of affordable housing meaning that not all housing needs can be met. Similarly large urban extensions and / or new settlements may be a sustainable way to deliver housing but such options can take a long time to develop and cannot meet OAHN in full nor sustain rural communities. Therefore a combination of all Residential Growth Options including the six Areas of Search in the Strategic Growth Study should be considered as the best way to meet future housing needs.</p> <p>The Council should also apply a flexibility contingency to its overall housing land supply (HLS) in order that the new Local Plan is responsive to changing circumstances and the housing requirement is treated as a minimum rather than a maximum ceiling on overall HLS. where a Local Plan or a particular settlement or locality is highly dependent upon one or relatively few large strategic sites greater numerical flexibility is necessary than in cases where supply is more diversified. Large housing sites may be held back by numerous constraints, the HBF suggests as large a contingency as possible (at least 20%) because as any proposed contingency becomes smaller so any in built flexibility reduces.</p> <p>In Lichfield large existing strategic sites should be complimented by smaller scale non-strategic sites. This approach is also advocated in the Housing White Paper "Fixing the Broken Housing Market" because a good mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. The Strategic Growth Study is one piece of this evidence and provides a number of options for authorities to test, these are incorporated into the Scope, Issues & Options document.
SIO835	Jo Smith	1	If LP's were planned for 15 years ahead instead of 15 years then prevent confusing repetition one review concluding and the other starting	Comments noted
SIO836	Jo Smith	2	Evidence base needs to distinguish between LDC needs and those of Birmingham and Greater Birmingham otherwise needs analysis undermined.	Lichfield District forms part of the Greater Birmingham and Black Country Housing Market Area. As part of the duty to co-operate the Council has committed to engaging with its neighbours to meet the needs within the HMA.
SIO837	Jo Smith	3	No. Birmingham study identifies over 20 sites none are cross- compared to LDC growth options. Collaboration needs to be extended to assessment and prioritisation of sites in other LA areas. What are we comparing LDC options against, they are presented in a LDC bubble reduces credibility.	The Strategic Growth Study presents a series of options that can be tested. The Local Plan Review includes the options relevant to Lichfield District. However the Local Plan review is not confined to those options.

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SIO838	Home Builders Federation (Sue Green)	22	<p>The inter relationship between the new Lichfield Local Plan and the Greater Birmingham & Black Country HMA Strategic Growth Study should be transparent. The distribution strategy of the Strategic Growth Study identifies six areas of search in Lichfield. Of the four identified Residential Growth Options it is unlikely that any one Option could meet the housing needs of the District and unmet needs from elsewhere in the HMA. Not all housing needs can be met via brownfield and infill development. Associated risks with an over reliance on brownfield and infill sites because as a finite resource the availability of such sites will decline over time. Furthermore the artificial constraint of housing on greenfield sites will not ensure delivery of unviable brownfield sites nor will it assist with the delivery of affordable housing meaning that not all housing needs can be met. Similarly large urban extensions and / or new settlements may be a sustainable way to deliver housing but such options can take a long time to develop and cannot meet OAHN in full nor sustain rural communities. Therefore a combination of all Residential Growth Options including the six Areas of Search in the Strategic Growth Study should be considered as the best way to meet future housing needs.</p> <p>The Council should also apply a flexibility contingency to its overall housing land supply (HLS) in order that the new Local Plan is responsive to changing circumstances and the housing requirement is treated as a minimum rather than a maximum ceiling on overall HLS. where a Local Plan or a particular settlement or locality is highly dependent upon one or relatively few large strategic sites greater numerical flexibility is necessary than in cases where supply is more diversified. Large housing sites may be held back by numerous constraints, the HBF suggests as large a contingency as possible (at least 20%) because as any proposed contingency becomes smaller so any in built flexibility reduces.</p> <p>In Lichfield large existing strategic sites should be complimented by smaller scale non-strategic sites. This approach is also advocated in the Housing White Paper "Fixing the Broken Housing Market" because a good mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. The Strategic Growth Study is one piece of this evidence and provides a number of options for authorities to test, these are incorporated into the Scope, Issues & Options document.
SIO839	Jo Smith	4	Yes policies indicate where LDC growth would be acceptable prevent LDC needing to react to external pressures every five years. LDC to be proactive.	Policies do indicate where growth to fulfil LDC growth will be acceptable. The pressure to review every five years is placed on the authority by National Government guidance.
SIO840	Home Builders Federation (Sue Green)	23	<p>The inter relationship between the new Lichfield Local Plan and the Greater Birmingham & Black Country HMA Strategic Growth Study should be transparent. The distribution strategy of the Strategic Growth Study identifies six areas of search in Lichfield. Of the four identified Residential Growth Options it is unlikely that any one Option could meet the housing needs of the District and unmet needs from elsewhere in the HMA. Not all housing needs can be met via brownfield and infill development. Associated risks with an over reliance on brownfield and infill sites because as a finite resource the availability of such sites will decline over time. Furthermore the artificial constraint of housing on greenfield sites will not ensure delivery of unviable brownfield sites nor will it assist with the delivery of affordable housing meaning that not all housing needs can be met. Similarly large urban extensions and / or new settlements may be a sustainable way to deliver housing but such options can take a long time to develop and cannot meet OAHN in full nor sustain rural communities. Therefore a combination of all Residential Growth Options including the six Areas of Search in the Strategic Growth Study should be considered as the best way to meet future housing needs.</p> <p>The Council should also apply a flexibility contingency to its overall housing land supply (HLS) in order that the new Local Plan is responsive to changing circumstances and the housing requirement is treated as a minimum rather than a maximum ceiling on overall HLS. where a Local Plan or a particular settlement or locality is highly dependent upon one or relatively few large strategic sites greater numerical flexibility is necessary than in cases where supply is more diversified. Large housing sites may be held back by numerous constraints, the HBF suggests as large a contingency as possible (at least 20%) because as any proposed contingency becomes smaller so any in built flexibility reduces.</p> <p>In Lichfield large existing strategic sites should be complimented by smaller scale non-strategic sites. This approach is also advocated in the Housing White Paper "Fixing the Broken Housing Market" because a good mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. The Strategic Growth Study is one piece of this evidence and provides a number of options for authorities to test, these are incorporated into the Scope, Issues & Options document.
SIO841	Jo Smith	5	Yes. Those policies applying to NPs. LDC growth proposals affecting NPs should have a separate impact analysis as part of the overall assessment.	Comments noted, LDC will need to work the those areas that have made NPs where the Review will have an impact

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SIO842	Home Builders Federation (Sue Green)	24	<p>The inter relationship between the new Lichfield Local Plan and the Greater Birmingham & Black Country HMA Strategic Growth Study should be transparent. The distribution strategy of the Strategic Growth Study identifies six areas of search in Lichfield. Of the four identified Residential Growth Options it is unlikely that any one Option could meet the housing needs of the District and unmet needs from elsewhere in the HMA. Not all housing needs can be met via brownfield and infill development. Associated risks with an over reliance on brownfield and infill sites because as a finite resource the availability of such sites will decline over time. Furthermore the artificial constraint of housing on greenfield sites will not ensure delivery of unviable brownfield sites nor will it assist with the delivery of affordable housing meaning that not all housing needs can be met. Similarly large urban extensions and / or new settlements may be a sustainable way to deliver housing but such options can take a long time to develop and cannot meet OAHN in full nor sustain rural communities. Therefore a combination of all Residential Growth Options including the six Areas of Search in the Strategic Growth Study should be considered as the best way to meet future housing needs.</p> <p>The Council should also apply a flexibility contingency to its overall housing land supply (HLS) in order that the new Local Plan is responsive to changing circumstances and the housing requirement is treated as a minimum rather than a maximum ceiling on overall HLS. where a Local Plan or a particular settlement or locality is highly dependent upon one or relatively few large strategic sites greater numerical flexibility is necessary than in cases where supply is more diversified. Large housing sites may be held back by numerous constraints, the HBF suggests as large a contingency as possible (at least 20%) because as any proposed contingency becomes smaller so any in built flexibility reduces.</p> <p>In Lichfield large existing strategic sites should be complimented by smaller scale non-strategic sites. This approach is also advocated in the Housing White Paper "Fixing the Broken Housing Market" because a good mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. The Strategic Growth Study is one piece of this evidence and provides a number of options for authorities to test, these are incorporated into the Scope, Issues & Options document.
SIO843	Home Builders Federation (Sue Green)	25	<p>The inter relationship between the new Lichfield Local Plan and the Greater Birmingham & Black Country HMA Strategic Growth Study should be transparent. The distribution strategy of the Strategic Growth Study identifies six areas of search in Lichfield. Of the four identified Residential Growth Options it is unlikely that any one Option could meet the housing needs of the District and unmet needs from elsewhere in the HMA. Not all housing needs can be met via brownfield and infill development. Associated risks with an over reliance on brownfield and infill sites because as a finite resource the availability of such sites will decline over time. Furthermore the artificial constraint of housing on greenfield sites will not ensure delivery of unviable brownfield sites nor will it assist with the delivery of affordable housing meaning that not all housing needs can be met. Similarly large urban extensions and / or new settlements may be a sustainable way to deliver housing but such options can take a long time to develop and cannot meet OAHN in full nor sustain rural communities. Therefore a combination of all Residential Growth Options including the six Areas of Search in the Strategic Growth Study should be considered as the best way to meet future housing needs.</p> <p>The Council should also apply a flexibility contingency to its overall housing land supply (HLS) in order that the new Local Plan is responsive to changing circumstances and the housing requirement is treated as a minimum rather than a maximum ceiling on overall HLS. where a Local Plan or a particular settlement or locality is highly dependent upon one or relatively few large strategic sites greater numerical flexibility is necessary than in cases where supply is more diversified. Large housing sites may be held back by numerous constraints, the HBF suggests as large a contingency as possible (at least 20%) because as any proposed contingency becomes smaller so any in built flexibility reduces.</p> <p>In Lichfield large existing strategic sites should be complimented by smaller scale non-strategic sites. This approach is also advocated in the Housing White Paper "Fixing the Broken Housing Market" because a good mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. The Strategic Growth Study is one piece of this evidence and provides a number of options for authorities to test, these are incorporated into the Scope, Issues & Options document.

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SIO844	Home Builders Federation (Sue Green)	26	<p>The inter relationship between the new Lichfield Local Plan and the Greater Birmingham & Black Country HMA Strategic Growth Study should be transparent. The distribution strategy of the Strategic Growth Study identifies six areas of search in Lichfield. Of the four identified Residential Growth Options it is unlikely that any one Option could meet the housing needs of the District and unmet needs from elsewhere in the HMA. Not all housing needs can be met via brownfield and infill development. Associated risks with an over reliance on brownfield and infill sites because as a finite resource the availability of such sites will decline over time. Furthermore the artificial constraint of housing on greenfield sites will not ensure delivery of unviable brownfield sites nor will it assist with the delivery of affordable housing meaning that not all housing needs can be met. Similarly large urban extensions and / or new settlements may be a sustainable way to deliver housing but such options can take a long time to develop and cannot meet OAHN in full nor sustain rural communities. Therefore a combination of all Residential Growth Options including the six Areas of Search in the Strategic Growth Study should be considered as the best way to meet future housing needs.</p> <p>The Council should also apply a flexibility contingency to its overall housing land supply (HLS) in order that the new Local Plan is responsive to changing circumstances and the housing requirement is treated as a minimum rather than a maximum ceiling on overall HLS. where a Local Plan or a particular settlement or locality is highly dependent upon one or relatively few large strategic sites greater numerical flexibility is necessary than in cases where supply is more diversified. Large housing sites may be held back by numerous constraints, the HBF suggests as large a contingency as possible (at least 20%) because as any proposed contingency becomes smaller so any in built flexibility reduces.</p> <p>In Lichfield large existing strategic sites should be complimented by smaller scale non-strategic sites. This approach is also advocated in the Housing White Paper "Fixing the Broken Housing Market" because a good mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. The Strategic Growth Study is one piece of this evidence and provides a number of options for authorities to test, these are incorporated into the Scope, Issues & Options document.
SIO845	Jo Smith	7	Yes as stated in Q2 and Q4 LDC should be seen as distinct from other needs and in advance of the five year review. Reviews where the housing growth potential however limited is to be found in LDC and if available and justified for external use.	Lichfield District forms part of the Greater Birmingham and Black Country Housing Market Area. As part of the duty to cooperate the Council has committed to engaging with its neighbours to meet the needs within the HMA.
SIO846	Home Builders Federation (Sue Green)	27	<p>The inter relationship between the new Lichfield Local Plan and the Greater Birmingham & Black Country HMA Strategic Growth Study should be transparent. The distribution strategy of the Strategic Growth Study identifies six areas of search in Lichfield. Of the four identified Residential Growth Options it is unlikely that any one Option could meet the housing needs of the District and unmet needs from elsewhere in the HMA. Not all housing needs can be met via brownfield and infill development. Associated risks with an over reliance on brownfield and infill sites because as a finite resource the availability of such sites will decline over time. Furthermore the artificial constraint of housing on greenfield sites will not ensure delivery of unviable brownfield sites nor will it assist with the delivery of affordable housing meaning that not all housing needs can be met. Similarly large urban extensions and / or new settlements may be a sustainable way to deliver housing but such options can take a long time to develop and cannot meet OAHN in full nor sustain rural communities. Therefore a combination of all Residential Growth Options including the six Areas of Search in the Strategic Growth Study should be considered as the best way to meet future housing needs.</p> <p>The Council should also apply a flexibility contingency to its overall housing land supply (HLS) in order that the new Local Plan is responsive to changing circumstances and the housing requirement is treated as a minimum rather than a maximum ceiling on overall HLS. where a Local Plan or a particular settlement or locality is highly dependent upon one or relatively few large strategic sites greater numerical flexibility is necessary than in cases where supply is more diversified. Large housing sites may be held back by numerous constraints, the HBF suggests as large a contingency as possible (at least 20%) because as any proposed contingency becomes smaller so any in built flexibility reduces.</p> <p>In Lichfield large existing strategic sites should be complimented by smaller scale non-strategic sites. This approach is also advocated in the Housing White Paper "Fixing the Broken Housing Market" because a good mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. The Strategic Growth Study is one piece of this evidence and provides a number of options for authorities to test, these are incorporated into the Scope, Issues & Options document.

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SIO847	Home Builders Federation (Sue Green)	28	<p>The inter relationship between the new Lichfield Local Plan and the Greater Birmingham & Black Country HMA Strategic Growth Study should be transparent. The distribution strategy of the Strategic Growth Study identifies six areas of search in Lichfield. Of the four identified Residential Growth Options it is unlikely that any one Option could meet the housing needs of the District and unmet needs from elsewhere in the HMA. Not all housing needs can be met via brownfield and infill development. Associated risks with an over reliance on brownfield and infill sites because as a finite resource the availability of such sites will decline over time. Furthermore the artificial constraint of housing on greenfield sites will not ensure delivery of unviable brownfield sites nor will it assist with the delivery of affordable housing meaning that not all housing needs can be met. Similarly large urban extensions and / or new settlements may be a sustainable way to deliver housing but such options can take a long time to develop and cannot meet OAHN in full nor sustain rural communities. Therefore a combination of all Residential Growth Options including the six Areas of Search in the Strategic Growth Study should be considered as the best way to meet future housing needs.</p> <p>The Council should also apply a flexibility contingency to its overall housing land supply (HLS) in order that the new Local Plan is responsive to changing circumstances and the housing requirement is treated as a minimum rather than a maximum ceiling on overall HLS. where a Local Plan or a particular settlement or locality is highly dependent upon one or relatively few large strategic sites greater numerical flexibility is necessary than in cases where supply is more diversified. Large housing sites may be held back by numerous constraints, the HBF suggests as large a contingency as possible (at least 20%) because as any proposed contingency becomes smaller so any in built flexibility reduces.</p> <p>In Lichfield large existing strategic sites should be complimented by smaller scale non-strategic sites. This approach is also advocated in the Housing White Paper "Fixing the Broken Housing Market" because a good mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. The Strategic Growth Study is one piece of this evidence and provides a number of options for authorities to test, these are incorporated into the Scope, Issues & Options document.
SIO849	Home Builders Federation (Sue Green)	30	<p>The inter relationship between the new Lichfield Local Plan and the Greater Birmingham & Black Country HMA Strategic Growth Study should be transparent. The distribution strategy of the Strategic Growth Study identifies six areas of search in Lichfield. Of the four identified Residential Growth Options it is unlikely that any one Option could meet the housing needs of the District and unmet needs from elsewhere in the HMA. Not all housing needs can be met via brownfield and infill development. Associated risks with an over reliance on brownfield and infill sites because as a finite resource the availability of such sites will decline over time. Furthermore the artificial constraint of housing on greenfield sites will not ensure delivery of unviable brownfield sites nor will it assist with the delivery of affordable housing meaning that not all housing needs can be met. Similarly large urban extensions and / or new settlements may be a sustainable way to deliver housing but such options can take a long time to develop and cannot meet OAHN in full nor sustain rural communities. Therefore a combination of all Residential Growth Options including the six Areas of Search in the Strategic Growth Study should be considered as the best way to meet future housing needs.</p> <p>The Council should also apply a flexibility contingency to its overall housing land supply (HLS) in order that the new Local Plan is responsive to changing circumstances and the housing requirement is treated as a minimum rather than a maximum ceiling on overall HLS. where a Local Plan or a particular settlement or locality is highly dependent upon one or relatively few large strategic sites greater numerical flexibility is necessary than in cases where supply is more diversified. Large housing sites may be held back by numerous constraints, the HBF suggests as large a contingency as possible (at least 20%) because as any proposed contingency becomes smaller so any in built flexibility reduces.</p> <p>In Lichfield large existing strategic sites should be complimented by smaller scale non-strategic sites. This approach is also advocated in the Housing White Paper "Fixing the Broken Housing Market" because a good mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. The Strategic Growth Study is one piece of this evidence and provides a number of options for authorities to test, these are incorporated into the Scope, Issues & Options document.
SIO850	Jo Smith	8	No you have not identified the LDC need. Review not crossed compared LDC options to GBHMA Study. See above for what needs to be done.	There is no requirement for the Review to cross compare the approach of other LPAs. Notwithstanding this LDC actively engage in DTC discussions and where appropriate comment on other LPA plans
SIO851	Jo Smith	9	Agree with LDC vision and other for Key rural settlements not of which indicate excessive growth.	Comments noted
SIO852	Jo Smith	10	Yes support the LDC SO not one of which supports the options for growth in urban fringe extension new Little Aston or a new settlement in Shenstone.	Comments noted - however the vision as currently drafted does not restrict growth across the District.
SIO853	Jo Smith	11	Yes well designed and managed in existing urban areas - reduce pressure on GB.	Comments noted
SIO854	Jo Smith	12	LDC should be more transparent about GBHMA contributions to date and more transparent about current proposals. Without this ambiguity uncertainty and low confidence in any new proposals will continue.	Comments noted
SIO855	Jo Smith	13	Yes small self build affordable ownership - small overall contribution nationally.	Comments noted
SIO856	Jo Smith	14	Yes, an LDC promotion of small pre-purchased sites and grants.	Comments noted
SIO857	Jo Smith	15	Yes. The lack of a confident and clear traveller site allocation by LDC has led to random applications for traveller sites in the Shenstone Parish Council area. However, sensitive and complex the LDC Review must designate sites so they can deal with random landowner applications more effectively.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence including a Gypsy Traveller Needs Assessment.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO858	Essington Park Ltd (CT Planning)	1	Yes the plan period of 2020-2036 is appropriate.	Comments noted
SIO859	Jo Smith	16	Only if liaison with Travellers justifies a cross boundary approach. A cross boundary approach on its own is not enough if it does not deliver appropriate solutions.	Comments noted
SIO860	Essington Park Ltd (CT Planning)	2	The Rural Settlement Sustainability Study should be reviewed and revised to ensure the provision of services and facilities in the District's Villages is up to date.	Consideration of updating the RSSS will be undertaken
SIO861	Essington Park Ltd (CT Planning)	3	Yes, the key strategic cross boundary issues have been identified.	Comments noted
SIO862	Jo Smith	17	Yes support existing Town Centre growth	Comments noted
SIO863	Jo Smith	20	Electrification of rail link between Alrewas and Lichfield should be considered as part of the review other drivers NA and FATraining centre.	Comments noted. New services linking Lichfield Trent Valley And Burton upon Trent including necessary and relevant infrastructure such as electrification, capacity/speed improvements and re-signalling between Lichfield Trent Valley and Wychnor Junction is identified as an infrastructure requirement with the current IDP March 2018, if following consultation with providers and regulators this response remains relevant it will become an infrastructure requirement articulated through the proposed structure.
SIO864	Jo Smith	21	Yes focus growth around existing centres advantage of services and amenities with the exception of northern fringe Birmingham Sutton Coalfield. Little Aston has no existing infrastructure.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO865	Essington Park Ltd (CT Planning)	4	Policies should be amended where there have been changes in circumstances and additional policies should be incorporated to ensure full and proper compliance with the NPPF.	The revised NPPF will need to be considered through the Local Plan Review process
SIO866	Essington Park Ltd (CT Planning)	11	No the Local plan Review should not consider the inclusion of a density policy.	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO867	Essington Park Ltd (CT Planning)	12	Lichfield District Council should assist in meeting the unmet needs of the Greater Birmingham Housing Market Area. The allocation should be fair and proportionate.	Comments noted. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield.
SIO868	Jo Smith	22	See comments above	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO869	Essington Park Ltd (CT Planning)	21	No. Town focussed development is not an appropriate growth option for the District.	Comments noted.
SIO870	Jo Smith	23	No Agree with growth focussed on town centres only. Successfully in current plan. No evidence that named key settlements have capacity to sustain meaningful growth. Sutton Coalfield Birmingham option on the Sothern border is neither a Town centre of key rural settlement it is urban fringe development in the green belt, See response to Q 21 and 28.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO871	Jo Smith	24	No. No evidence to sustain meaning full growth in these locations. Shenstone NP runs to 2029. SHLAA identifies Shenstone business park as a site this should be investigated further. NP researched vacancy rates and showed potential for housing and deployment of business. No evidence this has been refreshed. Stonnall and Little Aston have NPs similar commitments address local need whilst maintain self-controlled community and clear physical boundaries.	Comments noted. Where neighbourhood plans are in place these form part of the development plan for the area.
SIO872	Essington Park Ltd (CT Planning)	23	Yes. Agree that focussing development around the existing towns and Key Rural Settlements is an appropriate option for growth for the District	Comments noted.
SIO873	Essington Park Ltd (CT Planning)	24	Agree with the identification of the Key Villages including Alrewas.	Comments noted.
SIO874	Essington Park Ltd (CT Planning)	25	Pursuing Growth Option 2 where new development would be located in the towns and Key Villages will clearly provide for new housing coming forward in the most sustainable settlements in the District. It would consolidate and continue the existing Spatial Strategy for a further 7 years. This growth option helps to support rural services and facilities. It provides house purchasers with a choice of homes in both rural and urban locations. The settlement of Alrewas is capable of accommodating new housing development. One such site is Land North of Dark Lane, forming the western extension to the proposed allocation A2. The site is within walking distances of services and facilities in the village and to the public transport route that passes through Alrewas. Planning permission (reference 13/01175/FULM) has been granted for the erection of 121 dwellings to the east of the site. The site could be developed without adversely impacting upon the Conservation Area. The site is capable of accommodating some 20 dwellings and could provide variety in terms of house type, design, size and tenure.	Comments noted.
SIO875	Jo Smith	25	Yes. Growth in existing town centres and Growth Settlements <u>outside</u> the Green Belt.	Comments noted.
SIO876	Jo Smith	26	Rural settlements are not appropriate as an overall housing supply strategy. They do not contain the services or infrastructure requirements for significant growth.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO877	Jo Smith	28	No Shenstone Area New Settlement should be omitted. A the only new settlement option in the Green Belt B is the only new settlement option breaching safeguarding of encroachment policy c is the only new settlement option breaching Strategic Separate policy D is the only new settlement option breaching Local Separation Policy. Designations in GBHMA no reference to impact assessment on these designations in LDC review. Credibility of Birmingham growth study - good access to transport should be challenged on capacity and distance stated.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. The Strategic Growth Study is one piece of this evidence and provides a number of options for authorities to test, these are incorporated into the Scope, Issues & Options document.
SIO878	Jo Smith	29	The Alrewas/Fradley and Thorpe Constantine sites do not have the location disadvantages identified above in response to Q28.	Comments noted.
SIO879	Jo Smith	30	Yes, comparisons of Alrewas/Fradley and Thorpe Constantine sites against other GBHMA new settlement sites.	Comment noted.
SIO880	Jo Smith	31	Yes, as the most appropriate employment development access and capacity exists in these locations.	Comments noted.
SIO881	Jo Smith	34	No inclusion of new employment location in Senstone. Shenstone has an existing employment area long term vacancy rates due to location space structures, Local Infrastructure can sustain further HGV. Current turn over evidence this.	Disagree. Regeneration of employment in Shenstone supports its key rural settlement status and Policy Shen3: Shenstone Economy in the Local Plan Strategy. Core Policy 4: Delivering our Infrastructure in the Local Plan Strategy requires infrastructure at the appropriate stage of development.
SIO882	Jo Smith	38	See Q20 (electrification of rail link between alrewas and Lichfield should be consider as part of the review other drivers NA and FATraining centre).	Comments noted: New services linking Lichfield Trent Valley And Burton upon Trent including necessary and relevant infrastructure such as electrification , capacity/speed improvements and re-signalling between Lichfield Trent Valley and Wychnor Junction is identified as an infrastructure requirement with the current IDP March 2018, if following consultation with providers and regulators this response remains relevant it will be become an infrastructure requirement articulated through the proposed structure.
SIO883	Jo Smith	39	yes critical	Comments noted
SIO884	Patrick Martin	3	No BSLS has over 20 alternatives non are crossed compared to LDC proposals. Collaborative approach needs to extend to assessment of alternative sites. Otherwise what are we comparing against.	The Strategic Growth Study presents a series of options that can be tested. The Local Plan Review includes the options relevant to Lichfield District. However the Local Plan review is not confined to those options.
SIO885	Patrick Martin	5	Yes those policies applying to NP - need separate impact analysis as part of overall impact. Otherwise Np devalued.	Comments noted, LDC will need to work the those areas that have made NPs where the Review will have an impact
SIO886	Patrick Martin	8	No exact need for homes not identified review has not compared the LDC options with Greater Brum study.	There is no requirement for the Review to cross compare the approach of other LPAs. Notwithstanding this LDC actively engage in DtC discussions and where appropriate comment on other LPA plans
SIO887	Patrick Martin	9	Agree with visions including key rural visions. None of the key rural visions include excessive growth. Shenstone compact village centre with limited room for development and already have inadequate parking facilities for this unable to walk to the shops.	Comments noted
SIO888	Patrick Martin	10	Yes support Strategic Objectives - non set out urban fringe extension near Little Aston or a New Settlement at Shenstone.	Comments noted - however the vision as currently drafted does not restrict growth across the District.
SIO889	Patrick Martin	11	Yes well designed and managed in existing urban areas - reduce pressure on GB.	Comments noted
SIO890	Patrick Martin	13	Yes small self build affordable ownership - small overall contribution nationally.	Comments noted
SIO891	Patrick Martin	14	yes LDC promotion of small pre-purchased sites and grants	Comments noted
SIO892	Patrick Martin	17	Yes as they support existing town centre growth	Comments noted
SIO893	Patrick Martin	20	New settlement at Fradley and Alrewas than railway from Trent Valley to Wichnor Junction needs to be upgraded and electrified for passenger use, increasing connections to Birmingham and a new station at Alrewad with car parking. Stations at Shenstone and Black street insufficient parking. New station north of A5 would not meet the needs of residents at a new settlement unless the settlement was located north of A5 as travel via A5127 busy at peak times.	Comments noted. New services linking Lichfield Trent Valley And Burton upon Trent including necessary and relevant infrastructure such as electrification, capacity/speed improvements and re-signalling between Lichfield Trent Valley and Wychnor Junction is identified as an infrastructure requirement with the current IDP March 2018, if following consultation with providers and regulators this response remains relevant it will be become an infrastructure requirement articulated through the proposed structure.
SIO894	Patrick Martin	21	Yes Little Aston has not shopping facilities Shenstone is inadequate.	Comments noted.
SIO895	Patrick Martin	22	see above comments	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO896	Patrick Martin	23	No Agree with growth focussed on town centres only. Successfully in current plan. No evidence that named key settlements have capacity to sustain meaningful growth.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO897	Patrick Martin	24	No evidence of capacity to sustain any meaningful growth in these locations.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO898	Patrick Martin	25	Yes Growth in existing town centres and Growth settlements outside Green Belt.	Comments noted.
SIO899	Patrick Martin	26	Rural settlements are not appropriate as an overall housing supply strategy. They do not contain the services or infrastructure required for growth.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO900	Patrick Martin	28	No Shenstone Area New Settlement should be omitted. A the only new settlement option in the Green Belt B is the only new settlement option breaching safeguarding of encroachment policy c is the only new settlement option breaching Strategic Separate policy D is the only new settlement option breaching Local Separation Policy. Designations in GBHMA no reference to impact assessment on these designations in LDC review. Credibility of Birmingham growth study - good access to transport should be challenged on capacity and distance stated.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. The Strategic Growth Study is one piece of this evidence and provides a number of options for authorities to test, these are incorporated into the Scope, Issues & Options document.
SIO901	Patrick Martin	29	The Alrewas/Fradley and Thorpe Constantine sites do not have the location disadvantages identified above in response to Q28.	Comments noted.
SIO902	Patrick Martin	30	Yes, comparisons of Alrewas/Fradley and Thorpe Constantine sites against other GBHMA new settlement sites.	Comment noted.
SIO903	Patrick Martin	31	Yes, as the most appropriate employment development access and capacity exists in these locations.	Comments noted.
SIO904	Patrick Martin	34	No inclusion of new employment location in Senstone. Shenstone has an existing employment area long term vacancy rates due to location space structures, Local Infrastructure can sustain further HGV. Current turn over evidence this.	Disagree. Regeneration of employment in Shenstone supports its key rural settlement status and Policy Shen3: Shenstone Economy in the Local Plan Strategy. Core Policy 4: Delivering our Infrastructure in the Local Plan Strategy requires infrastructure at the appropriate stage of development.
SIO905	Patrick Martin	38	See Q20 (New settlement at Fradley and Alrewas than railway from Trent Valley to Wichnor Junction needs to be upgraded and electrified for passenger use, increasing connections to Birmingham and a new station at ALREWAS with car parking. Stations at Shenstone and Black street insufficient parking. New station north of A5 would not meet the needs of residents at a new settlement unless the settlement was located north of A5 as travel via A5127 busy at peak times).	Comments noted: New services linking Lichfield Trent Valley And Burton upon Trent including necessary and relevant infrastructure such as electrification , capacity/speed improvements and re-signalling between Lichfield Trent Valley and Wichnor Junction is identified as an infrastructure requirement with the current IDP March 2018, if following consultation with providers and regulators this response remains relevant it will be become an infrastructure requirement articulated through the proposed structure.
SIO906	Patrick Martin	39	Yes it is critical.	Comments noted
SIO907	Bloor Homes (Define)	3	Land interests at Mile Oak Outlines the Birmingham housing shortfall position. The Local Plan Review document refers to a continued commitment to address the wider HMA needs and highlights the final distribution of unmet needs is still to be agreed. The absence of the MOU/ SOCG is a real concern as there has not been a positive outcome to the engagement the DC has undertaken with GBHMA partners to ensure that housing needs are properly identified and effectively provided for. The unmet housing need in Birmingham needs to be addressed as a priority in the review. The District Council must also positively engage with Tamworth Borough to identify and address its shortfall. The SGC only considers the level of housing need at the GBHMA level, it is essential the market and affordable housing needs arising in the District itself over the period to 2036 are identified and fully provided for in the Local Plan in accordance with the NPPF.	Comments noted, LDC will continue to engage with the GBBCHMA to seek to ensure a consistent approach is applied
SIO908	Bloor Homes (Define)	Whole Document	Land interests at Mile Oak Outlines the National Policy Context, making reference to Para 7, 9, 14, 17 and 47 relating to housing needs and Para 54, 179 and 181 relating to the duty to cooperate. Welcome the LPR and the proposed plan period to 2036 to address the needs arising in the District and appropriately address unmet needs arising from the HMA and those in Tamworth is supported to ensure the NPPF's policy imperatives are being effectively addressed.	Comments noted.
SIO909	Bloor Homes (Define)	Whole Document	Land interests at Lichfield Outlines the National Policy Context, making reference to Para 7, 9, 14, 17 and 47 relating to housing needs and Para 54, 179 and 181 relating to the duty to cooperate. Welcome the LPR and the proposed plan period to 2036 to address the needs arising in the District and appropriately address unmet needs arising from the HMA and those in Tamworth is supported to ensure the NPPF's policy imperatives are being effectively addressed.	Comments noted.
SIO910	Bloor Homes (Define)	1	Land interests at Mile Oak A plan period to 2036 would align with the GBHMA SGS. On that basis the plan period is supported, however this must be on the basis that the LPR will reflect the evolving strategic context that the identified development needs in the District and across the HMA are provided for throughout the plan period.	Comments noted

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO911	Bloor Homes (Define)	1	<p>Land interests at Lichfield</p> <p>A plan period to 2036 would align with the GBHMA SGS. On that basis the plan period is supported, however this must be on the basis that the LPR will reflect the evolving strategic context that the identified development needs in the District and across the HMA are provided for throughout the plan period.</p>	Comments noted
SIO912	Bloor Homes (Define)	12	<p>Land interests at Mile Oak</p> <p>Outlines the Birmingham housing shortfall position. The Local Plan Review document refers to a continued commitment to address the wider HMA needs and highlights the final distribution of unmet needs is still to be agreed. The absence of the MOU/ SOCG is a real concern as there has not been a positive outcome to the engagement the DC has undertaken with GBHMA partners to ensure that housing needs are properly identified and effectively provided for. The unmet housing need in Birmingham needs to be addressed as a priority in the review.</p> <p>The District Council must also positively engage with Tamworth Borough to identify and address its shortfall.</p> <p>The SGC only considers the level of housing need at the GBHMA level, it is essential the market and affordable housing needs arising in the District itself over the period to 2036 are identified and fully provided for in the Local Plan in accordance with the NPPF.</p>	The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield. The Local Plan Review will consider the most appropriate Spatial Strategy and quantum for growth. This will be informed by a range of evidence.
SIO913	Bloor Homes (Define)	3	<p>Land interests at Lichfield</p> <p>Outlines the Birmingham housing shortfall position. The Local Plan Review document refers to a continued commitment to address the wider HMA needs and highlights the final distribution of unmet needs is still to be agreed. The absence of the MOU/ SOCG is a real concern as there has not been a positive outcome to the engagement the DC has undertaken with GBHMA partners to ensure that housing needs are properly identified and effectively provided for. The unmet housing need in Birmingham needs to be addressed as a priority in the review.</p> <p>The District Council must also positively engage with Tamworth Borough to identify and address its shortfall.</p> <p>The SGC only considers the level of housing need at the GBHMA level, it is essential the market and affordable housing needs arising in the District itself over the period to 2036 are identified and fully provided for in the Local Plan in accordance with the NPPF.</p>	Comments noted, LDC will continue to engage with the GBBCHMA to seek to ensure a consistent approach is applied
SIO914	Bloor Homes (Define)	12	<p>Land interests at Lichfield</p> <p>Outlines the Birmingham housing shortfall position. The Local Plan Review document refers to a continued commitment to address the wider HMA needs and highlights the final distribution of unmet needs is still to be agreed. The absence of the MOU/ SOCG is a real concern as there has not been a positive outcome to the engagement the DC has undertaken with GBHMA partners to ensure that housing needs are properly identified and effectively provided for. The unmet housing need in Birmingham needs to be addressed as a priority in the review.</p> <p>The District Council must also positively engage with Tamworth Borough to identify and address its shortfall.</p> <p>The SGC only considers the level of housing need at the GBHMA level, it is essential the market and affordable housing needs arising in the District itself over the period to 2036 are identified and fully provided for in the Local Plan in accordance with the NPPF.</p>	The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield. The Local Plan Review will consider the most appropriate Spatial Strategy and quantum for growth. This will be informed by a range of evidence.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO915	Bloor Homes (Define)	21	<p>Land interests at Mile Oak</p> <p>The Local Plan Review must facilitate a continual supply of market and affordable housing from a portfolio of deliverable development sites based on a robust and sustainable spatial development strategy with sufficient flexibility. This reflects the overarching conclusion of the SGS para 9.4</p> <p>A Green Belt review will be required to release and allocate sites for development where they are best placed to address the identified housing needs and delivery can be supported through the provision of infrastructure.</p> <p>That portfolio approach will, however, ensure a rolling 5 year housing land supply is maintained and that the overall housing requirements are met within the plan period so that everyone actually has the opportunity of a decent home in a sustainable community and that the nation's housing crisis is addressed.</p> <p>Mile Oak, Tamworth</p> <p>LPR references potential growth for north west / west of Tamworth (Options 1 and 4) and at Mile Oak (Option 2 and 3), the potential of this area as an element of any future spatial development strategy is welcome. This reflects of the findings of the SGC that identifies north west and west Tamworth as a potential urban extension. The Area of Search should logically include the land to the south of the A5 and west of Mile Oak.</p> <p>Confirms Bloor Homes control land to west of Mile Oak that is immediately available for residential development. Whilst site is currently green belt, the sustainability and deliverability of the identified opportunity must be the determinative considerations. Provides a concept masterplan and confirms the development would provide circa 1,000 dwellings with key community facilities including a primary school.</p> <p>Supportive of the identification and consideration of strategic urban extensions to Tamworth</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO916	Bloor Homes (Define)	22	<p>Land interests at Mile Oak</p> <p>The Local Plan Review must facilitate a continual supply of market and affordable housing from a portfolio of deliverable development sites based on a robust and sustainable spatial development strategy with sufficient flexibility. This reflects the overarching conclusion of the SGC para 9.4</p> <p>A Green Belt review will be required to release and allocate sites for development where they are best placed to address the identified housing needs and delivery can be supported through the provision of infrastructure.</p> <p>That portfolio approach will, however, ensure a rolling 5 year housing land supply is maintained and that the overall housing requirements are met within the plan period so that everyone actually has the opportunity of a decent home in a sustainable community and that the nation's housing crisis is addressed.</p> <p>Mile Oak, Tamworth</p> <p>LPR references potential growth for north west / west of Tamworth (Options 1 and 4) and at Mile Oak (Option 2 and 3), the potential of this area as an element of any future spatial development strategy is welcome. This reflects of the findings of the SGC that identifies north west and west Tamworth as a potential urban extension. The Area of Search should logically include the land to the south of the A5 and west of Mile Oak.</p> <p>Confirms Bloor Homes control land to west of Mile Oak that is immediately available for residential development. Whilst site is currently green belt, the sustainability and deliverability of the identified opportunity must be the determinative considerations. Provides a concept masterplan and confirms the development would provide circa 1,000 dwellings with key community facilities including a primary school.</p> <p>Supportive of the identification and consideration of strategic urban extensions to Tamworth</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO917	Bloor Homes (Define)	21	<p>Land interests at Lichfield</p> <p>The Local Plan Review must facilitate a continual supply of market and affordable housing from a portfolio of deliverable development sites based on a robust and sustainable spatial development strategy with sufficient flexibility. This reflects the overarching conclusion of the SGC para 9.4</p> <p>A Green Belt review will be required to release and allocate sites for development where they are best placed to address the identified housing needs and delivery can be supported through the provision of infrastructure.</p> <p>That portfolio approach will, however, ensure a rolling 5 year housing land supply is maintained and that the overall housing requirements are met within the plan period so that everyone actually has the opportunity of a decent home in a sustainable community and that the nation's housing crisis is addressed.</p> <p>Fosseway Lane, Lichfield Lichfield should retain its role as a sustainable location for future growth and accommodate new homes to meet the housing needs arising within the District and the wider GBHMA. That is not to say Option 1 is supported per se, but the city functions as the social and economic focus for the District and is the primary location where significant housing need and demand is generated. Therefore additional development site should be identified within and adjacent to the town as part of any future spatial development strategy. That should be in land around Fosseway Lane which has capacity to deliver a further sustainable extension to the City.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO918	Bloor Homes (Define)	22	<p>Land interests at Lichfield</p> <p>The Local Plan Review must facilitate a continual supply of market and affordable housing from a portfolio of deliverable development sites based on a robust and sustainable spatial development strategy with sufficient flexibility. This reflects the overarching conclusion of the SGC para 9.4</p> <p>A Green Belt review will be required to release and allocate sites for development where they are best placed to address the identified housing needs and delivery can be supported through the provision of infrastructure.</p> <p>That portfolio approach will, however, ensure a rolling 5 year housing land supply is maintained and that the overall housing requirements are met within the plan period so that everyone actually has the opportunity of a decent home in a sustainable community and that the nation's housing crisis is addressed.</p> <p>Fosseway Lane, Lichfield Lichfield should retain its role as a sustainable location for future growth and accommodate new homes to meet the housing needs arising within the District and the wider GBHMA. That is not to say Option 1 is supported per se, but the city functions as the social and economic focus for the District and is the primary location where significant housing need and demand is generated. Therefore additional development site should be identified within and adjacent to the town as part of any future spatial development strategy. That should be in land around Fosseway Lane which has capacity to deliver a further sustainable extension to the City.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO919	Bloor Homes (Define)	23	<p>Land interests at Lichfield</p> <p>The Local Plan Review must facilitate a continual supply of market and affordable housing from a portfolio of deliverable development sites based on a robust and sustainable spatial development strategy with sufficient flexibility. This reflects the overarching conclusion of the SGC para 9.4</p> <p>A Green Belt review will be required to release and allocate sites for development where they are best placed to address the identified housing needs and delivery can be supported through the provision of infrastructure.</p> <p>That portfolio approach will, however, ensure a rolling 5 year housing land supply is maintained and that the overall housing requirements are met within the plan period so that everyone actually has the opportunity of a decent home in a sustainable community and that the nation's housing crisis is addressed.</p> <p>Fosseway Lane, Lichfield Lichfield should retain its role as a sustainable location for future growth and accommodate new homes to meet the housing needs arising within the District and the wider GBHMA. That is not to say Option 1 is supported per se, but the city functions as the social and economic focus for the District and is the primary location where significant housing need and demand is generated. Therefore additional development site should be identified within and adjacent to the town as part of any future spatial development strategy. That should be land around Fosseway Lane which has capacity to deliver a further sustainable extension to the City.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO920	St Modwens (CBRE)	Whole Document	<p>Promoting circa 12 hectares of employment land south of Lichfield at Cricket Lane, which is currently allocated for employment as part of the Cricket Lane Strategic Development Allocation included within the adopted Local Plan Strategy. A planning application for the entire Cricket Lane SDA, incorporating the residential and employment components and associated green and other infrastructure, is being finalised and is due to be submitted imminently by Pegasus Planning (Persimmon's Planning agent).</p> <p>A planning application for the entire Cricket Lane SDA, incorporating the residential and employment components and associated green and other infrastructure, is being finalised and is due to be submitted imminently by Pegasus Planning (Persimmon's Planning agent).</p> <p>It is the intention that St Modwens will deliver employment development at the site on a phased basis in response to prevailing market requirements. Delivery of the site will likely start well in advance of significant progression on the Local Plan Review and the following comments to questions raised in the SIO are provided in this context and to assist the Council with the preparation of future local plan economic and employment-related policies in particular.</p>	Comments noted.
SIO921	Bloor Homes (Define)	24	<p>Land interests at Lichfield</p> <p>The Local Plan Review must facilitate a continual supply of market and affordable housing from a portfolio of deliverable development sites based on a robust and sustainable spatial development strategy with sufficient flexibility. This reflects the overarching conclusion of the SGC para 9.4</p> <p>A Green Belt review will be required to release and allocate sites for development where they are best placed to address the identified housing needs and delivery can be supported through the provision of infrastructure.</p> <p>That portfolio approach will, however, ensure a rolling 5 year housing land supply is maintained and that the overall housing requirements are met within the plan period so that everyone actually has the opportunity of a decent home in a sustainable community and that the nation's housing crisis is addressed.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO922	Bloor Homes (Define)	25	<p>Land interests at Lichfield</p> <p>The Local Plan Review must facilitate a continual supply of market and affordable housing from a portfolio of deliverable development sites based on a robust and sustainable spatial development strategy with sufficient flexibility. This reflects the overarching conclusion of the SGC para 9.4</p> <p>A Green Belt review will be required to release and allocate sites for development where they are best placed to address the identified housing needs and delivery can be supported through the provision of infrastructure.</p> <p>That portfolio approach will, however, ensure a rolling 5 year housing land supply is maintained and that the overall housing requirements are met within the plan period so that everyone actually has the opportunity of a decent home in a sustainable community and that the nation's housing crisis is addressed.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO923	Bloor Homes (Define)	26	<p>Land interests at Lichfield</p> <p>The Local Plan Review must facilitate a continual supply of market and affordable housing from a portfolio of deliverable development sites based on a robust and sustainable spatial development strategy with sufficient flexibility. This reflects the overarching conclusion of the SGC para 9.4</p> <p>A Green Belt review will be required to release and allocate sites for development where they are best placed to address the identified housing needs and delivery can be supported through the provision of infrastructure.</p> <p>That portfolio approach will, however, ensure a rolling 5 year housing land supply is maintained and that the overall housing requirements are met within the plan period so that everyone actually has the opportunity of a decent home in a sustainable community and that the nation's housing crisis is addressed.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO924	Bloor Homes (Define)	27	<p>Land interests at Lichfield</p> <p>The Local Plan Review must facilitate a continual supply of market and affordable housing from a portfolio of deliverable development sites based on a robust and sustainable spatial development strategy with sufficient flexibility. This reflects the overarching conclusion of the SGC para 9.4</p> <p>A Green Belt review will be required to release and allocate sites for development where they are best placed to address the identified housing needs and delivery can be supported through the provision of infrastructure.</p> <p>That portfolio approach will, however, ensure a rolling 5 year housing land supply is maintained and that the overall housing requirements are met within the plan period so that everyone actually has the opportunity of a decent home in a sustainable community and that the nation's housing crisis is addressed.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO925	Bloor Homes (Define)	28	<p>Land interests at Lichfield</p> <p>The Local Plan Review must facilitate a continual supply of market and affordable housing from a portfolio of deliverable development sites based on a robust and sustainable spatial development strategy with sufficient flexibility. This reflects the overarching conclusion of the SGC para 9.4</p> <p>A Green Belt review will be required to release and allocate sites for development where they are best placed to address the identified housing needs and delivery can be supported through the provision of infrastructure.</p> <p>That portfolio approach will, however, ensure a rolling 5 year housing land supply is maintained and that the overall housing requirements are met within the plan period so that everyone actually has the opportunity of a decent home in a sustainable community and that the nation's housing crisis is addressed.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO926	Bloor Homes (Define)	29	<p>Land interests at Lichfield</p> <p>The Local Plan Review must facilitate a continual supply of market and affordable housing from a portfolio of deliverable development sites based on a robust and sustainable spatial development strategy with sufficient flexibility. This reflects the overarching conclusion of the SGC para 9.4</p> <p>A Green Belt review will be required to release and allocate sites for development where they are best placed to address the identified housing needs and delivery can be supported through the provision of infrastructure.</p> <p>That portfolio approach will, however, ensure a rolling 5 year housing land supply is maintained and that the overall housing requirements are met within the plan period so that everyone actually has the opportunity of a decent home in a sustainable community and that the nation's housing crisis is addressed.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO927	Bloor Homes (Define)	30	<p>Land interests at Lichfield</p> <p>The Local Plan Review must facilitate a continual supply of market and affordable housing from a portfolio of deliverable development sites based on a robust and sustainable spatial development strategy with sufficient flexibility. This reflects the overarching conclusion of the SGC para 9.4</p> <p>A Green Belt review will be required to release and allocate sites for development where they are best placed to address the identified housing needs and delivery can be supported through the provision of infrastructure.</p> <p>That portfolio approach will, however, ensure a rolling 5 year housing land supply is maintained and that the overall housing requirements are met within the plan period so that everyone actually has the opportunity of a decent home in a sustainable community and that the nation's housing crisis is addressed.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO928	Bloor Homes (Define)	2	<p>Land interests at Lichfield</p> <p>Keep the housing need evidence base for both the District and wider HMA up to date throughout the plan making process Consider the wider opportunities for strategic growth, notably at Shenstone, including a review of the Green Belt in the District. Assess the future development needs of specific rural settlements required to meet local market and affordable housing need Review HLAA Provide an evidenced assessment of deliverability and anticipated rate of delivery of key existing and proposed development schemes required to address identified housing need Develop a robust IDP that co-ordinates, facilitates and supports the delivery of the required development and supporting infrastructure Undertake a cumulative viability assessment of the Local Plan proposals and requirements.</p>	<p>Consideration to undertaking a HEDNA will be undertaken</p> <p>Comments noted, consideration of a Green Belt Review will be undertaken</p> <p>Consideration of updating the RSSS will be undertaken</p> <p>Comments noted viability evidence will be considered</p>
SIO929	Bloor Homes (Define)	2	<p>Land interests at Mile Oak</p> <p>Keep the housing need evidence base for both the District and wider HMA up to date throughout the plan making process Consider the wider opportunities for strategic growth, notably at Shenstone, including a review of the Green Belt in the District. Assess the future development needs of specific rural settlements required to meet local market and affordable housing need Review HLAA Provide an evidenced assessment of deliverability and anticipated rate of delivery of key existing and proposed development schemes required to address identified housing need Develop a robust IDP that co-ordinates, facilitates and supports the delivery of the required development and supporting infrastructure Undertake a cumulative viability assessment of the Local Plan proposals and requirements.</p>	<p>Consideration to undertaking a HEDNA will be undertaken</p> <p>Comments noted, consideration of a Green Belt Review will be undertaken</p> <p>Consideration of updating the RSSS will be undertaken</p> <p>Comments noted viability evidence will be considered</p>

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO930	Bloor Homes (Define)	23	<p>Land interests at Mile Oak</p> <p>The Local Plan Review must facilitate a continual supply of market and affordable housing from a portfolio of deliverable development sites based on a robust and sustainable spatial development strategy with sufficient flexibility. This reflects the overarching conclusion of the SGC para 9.4</p> <p>A Green Belt review will be required to release and allocate sites for development where they are best placed to address the identified housing needs and delivery can be supported through the provision of infrastructure.</p> <p>That portfolio approach will, however, ensure a rolling 5 year housing land supply is maintained and that the overall housing requirements are met within the plan period so that everyone actually has the opportunity of a decent home in a sustainable community and that the nation's housing crisis is addressed.</p> <p>Mile Oak, Tamworth</p> <p>LPR references potential growth for north west / west of Tamworth (Options 1 and 4) and at Mile Oak (Option 2 and 3), the potential of this area as an element of any future spatial development strategy is welcome. This reflects the findings of the SGC that identifies north west and west Tamworth as a potential urban extension. The Area of Search should logically include the land to the south of the A5 and west of Mile Oak.</p> <p>Confirms Bloor Homes control land to west of Mile Oak that is immediately available for residential development. Whilst site is currently green belt, the sustainability and deliverability of the identified opportunity must be the determinative considerations. Provides a concept masterplan and confirms the development would provide circa 1,000 dwellings with key community facilities including a primary school.</p> <p>Supportive of the identification and consideration of strategic urban extensions to Tamworth</p> <p>Key Rural Settlements</p> <p>The LPR should positively address the NPPF's policy imperative to support thriving rural communities that is subsequently also reflected in the sustainable development policies relating to housing delivery.</p> <p>That is not to say 'Dispersed Growth' strategy as set out under Option 3 would be supported per se, but the District Council must ensure development needs of rural communities in the District are positively addressed over the plan period and the on-going role and function of the rural towns and villages, particularly Key Rural Settlements that are at the heart of those communities should be part of any future spatial development strategy (Option 2).</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO931	Bloor Homes (Define)	24	<p>Land interests at Mile Oak</p> <p>The Local Plan Review must facilitate a continual supply of market and affordable housing from a portfolio of deliverable development sites based on a robust and sustainable spatial development strategy with sufficient flexibility. This reflects the overarching conclusion of the SGC para 9.4</p> <p>A Green Belt review will be required to release and allocate sites for development where they are best placed to address the identified housing needs and delivery can be supported through the provision of infrastructure.</p> <p>That portfolio approach will, however, ensure a rolling 5 year housing land supply is maintained and that the overall housing requirements are met within the plan period so that everyone actually has the opportunity of a decent home in a sustainable community and that the nation's housing crisis is addressed.</p> <p>Mile Oak, Tamworth</p> <p>LPR references potential growth for north west / west of Tamworth (Options 1 and 4) and at Mile Oak (Option 2 and 3), the potential of this area as an element of any future spatial development strategy is welcome. This reflects the findings of the SGC that identifies north west and west Tamworth as a potential urban extension. The Area of Search should logically include the land to the south of the A5 and west of Mile Oak.</p> <p>Confirms Bloor Homes control land to west of Mile Oak that is immediately available for residential development. Whilst site is currently green belt, the sustainability and deliverability of the identified opportunity must be the determinative considerations. Provides a concept masterplan and confirms the development would provide circa 1,000 dwellings with key community facilities including a primary school.</p> <p>Supportive of the identification and consideration of strategic urban extensions to Tamworth</p> <p>Key Rural Settlements</p> <p>The LPR should positively address the NPPF's policy imperative to support thriving rural communities that is subsequently also reflected in the sustainable development policies relating to housing delivery.</p> <p>That is not to say 'Dispersed Growth' strategy as set out under Option 3 would be supported per se, but the District Council must ensure development needs of rural communities in the District are positively addressed over the plan period and the on-going role and function of the rural towns and villages, particularly Key Rural Settlements that are at the heart of those communities should be part of any future spatial development strategy (Option 2).</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO932	Bloor Homes (Define)	25	<p>Land interests at Mile Oak</p> <p>The Local Plan Review must facilitate a continual supply of market and affordable housing from a portfolio of deliverable development sites based on a robust and sustainable spatial development strategy with sufficient flexibility. This reflects the overarching conclusion of the SGC para 9.4</p> <p>A Green Belt review will be required to release and allocate sites for development where they are best placed to address the identified housing needs and delivery can be supported through the provision of infrastructure.</p> <p>That portfolio approach will, however, ensure a rolling 5 year housing land supply is maintained and that the overall housing requirements are met within the plan period so that everyone actually has the opportunity of a decent home in a sustainable community and that the nation's housing crisis is addressed.</p> <p>Mile Oak, Tamworth</p> <p>LPR references potential growth for north west / west of Tamworth (Options 1 and 4) and at Mile Oak (Option 2 and 3), the potential of this area as an element of any future spatial development strategy is welcome. This reflects of the findings of the SGC that identifies north west and west Tamworth as a potential urban extension. The Area of Search should logically include the land to the south of the A5 and west of Mile Oak.</p> <p>Confirms Bloor Homes control land to west of Mile Oak that is immediately available for residential development. Whilst site is currently green belt, the sustainability and deliverability of the identified opportunity must be the determinative considerations. Provides a concept masterplan and confirms the development would provide circa 1,000 dwellings with key community facilities including a primary school.</p> <p>Supportive of the identification and consideration of strategic urban extensions to Tamworth</p> <p>Key Rural Settlements</p> <p>The LPR should positively address the NPPF's policy imperative to support thriving rural communities that is subsequently also reflected in the sustainable development policies relating to housing delivery.</p> <p>That is not to say 'Dispersed Growth' strategy as set out under Option 3 would be supported per se, but the District Council must ensure development needs of rural communities in the District are positively addressed over the plan period and the on-going role and function of the rural towns and villages, particularly Key Rural Settlements that are at the heart of those communities should be part of any future spatial development strategy (Option 2).</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO933	Bloor Homes (Define)	26	<p>Land interests at Mile Oak</p> <p>The Local Plan Review must facilitate a continual supply of market and affordable housing from a portfolio of deliverable development sites based on a robust and sustainable spatial development strategy with sufficient flexibility. This reflects the overarching conclusion of the SGC para 9.4</p> <p>A Green Belt review will be required to release and allocate sites for development where they are best placed to address the identified housing needs and delivery can be supported through the provision of infrastructure.</p> <p>That portfolio approach will, however, ensure a rolling 5 year housing land supply is maintained and that the overall housing requirements are met within the plan period so that everyone actually has the opportunity of a decent home in a sustainable community and that the nation's housing crisis is addressed.</p> <p>Key Rural Settlements</p> <p>The LPR should positively address the NPPF's policy imperative to support thriving rural communities that is subsequently also reflected in the sustainable development policies relating to housing delivery.</p> <p>That is not to say 'Dispersed Growth' strategy as set out under Option 3 would be supported per se, but the District Council must ensure development needs of rural communities in the District are positively addressed over the plan period and the on-going role and function of the rural towns and villages, particularly Key Rural Settlements that are at the heart of those communities should be part of any future spatial development strategy (Option 2).</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO934	St Modwens (CBRE)	2	<p>Promoting circa 12ha of employment land at Cricket Lane.</p> <p>Important to ensure that the employment related evidence base documents, such as the Employment Land Review and Employment Land Availability Assessment, are up-to-date, robust and commercially facing in their approach to make the District a desirable place for businesses to locate and invest as noted in item 7 in the Key Issues Table.</p> <p>Regard should also be had to wider economic strategies and plans including those prepared by Local Enterprise Partnerships. For example, the GBSLEP Strategic Economic Plan (referenced at paragraph 1.22 of the SIO) highlights that across the area strategic employment land is in short supply, particularly the supply of land for large industrial units. It will be important that employment sites such as Cricket Lane is available to respond to this type of demand.</p>	Consideration of employment land and economic evidence will be undertaken
SIO935	Bloor Homes (Define)	27	<p>Land interests at Mile Oak</p> <p>The Local Plan Review must facilitate a continual supply of market and affordable housing from a portfolio of deliverable development sites based on a robust and sustainable spatial development strategy with sufficient flexibility. This reflects the overarching conclusion of the SGC para 9.4</p> <p>A Green Belt review will be required to release and allocate sites for development where they are best placed to address the identified housing needs and delivery can be supported through the provision of infrastructure.</p> <p>That portfolio approach will, however, ensure a rolling 5 year housing land supply is maintained and that the overall housing requirements are met within the plan period so that everyone actually has the opportunity of a decent home in a sustainable community and that the nation's housing crisis is addressed.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO936	Bloor Homes (Define)	28	<p>Land interests at Mile Oak</p> <p>The Local Plan Review must facilitate a continual supply of market and affordable housing from a portfolio of deliverable development sites based on a robust and sustainable spatial development strategy with sufficient flexibility. This reflects the overarching conclusion of the SGC para 9.4</p> <p>A Green Belt review will be required to release and allocate sites for development where they are best placed to address the identified housing needs and delivery can be supported through the provision of infrastructure.</p> <p>That portfolio approach will, however, ensure a rolling 5 year housing land supply is maintained and that the overall housing requirements are met within the plan period so that everyone actually has the opportunity of a decent home in a sustainable community and that the nation's housing crisis is addressed.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO937	Bloor Homes (Define)	29	<p>Land interests at Mile Oak</p> <p>The Local Plan Review must facilitate a continual supply of market and affordable housing from a portfolio of deliverable development sites based on a robust and sustainable spatial development strategy with sufficient flexibility. This reflects the overarching conclusion of the SGC para 9.4</p> <p>A Green Belt review will be required to release and allocate sites for development where they are best placed to address the identified housing needs and delivery can be supported through the provision of infrastructure.</p> <p>That portfolio approach will, however, ensure a rolling 5 year housing land supply is maintained and that the overall housing requirements are met within the plan period so that everyone actually has the opportunity of a decent home in a sustainable community and that the nation's housing crisis is addressed.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO938	Bloor Homes (Define)	30	<p>Land interests at Mile Oak</p> <p>The Local Plan Review must facilitate a continual supply of market and affordable housing from a portfolio of deliverable development sites based on a robust and sustainable spatial development strategy with sufficient flexibility. This reflects the overarching conclusion of the SGC para 9.4</p> <p>A Green Belt review will be required to release and allocate sites for development where they are best placed to address the identified housing needs and delivery can be supported through the provision of infrastructure.</p> <p>That portfolio approach will, however, ensure a rolling 5 year housing land supply is maintained and that the overall housing requirements are met within the plan period so that everyone actually has the opportunity of a decent home in a sustainable community and that the nation's housing crisis is addressed.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO939	St Modwens (CBRE)	3	<p>Promoting circa 12ha of employment land at Cricket Lane.</p> <p>In regard to unmet cross-boundary housing needs from elsewhere in the HMA, in addition to housing, constructive and active collaborative working with neighbouring authorities (and reflecting this approach in the evidence base to the Local Plan) will be necessary to deal with future employment requirements to meet the needs of the future population and the economic growth requirements of the (wider) area.</p>	Comments noted
SIO940	Barratt Homes (Michael Davies for Savills)	1	<p>Plan period proposed by LDC (2020 – 2036) is considered acceptable at this point in time. Local Plans are required to be kept up to date and we note that the Council anticipate having a plan adopted by 2020. However, one note of caution is that there is currently uncertainty around the housing shortfall in the Greater Birmingham Housing Market Area ('HMA') and the Black Country HMA and it is not clear when an agreement will be reached with all relevant neighbouring authorities within both HMAs on how these housing shortfalls will be addressed and to what degree any re-distribution will affect Lichfield's housing requirement. It may take longer than 18 months to agree what Lichfield's requirements are in this context and therefore this could place the ability to deliver an adopted plan by 2036 into question. If the plan period is to run until 2036 then this would tie in with the Greater Birmingham & The Black Country HMA Strategic Growth Study (February 2018) which considers the HMA housing need, supply and shortfall to the same timeframe.</p>	Comments noted
SIO941	Barratt Homes (Michael Davies for Savills)	3	<p>In respect of Site off Rugeley Road, Burntwood for residential development. Consider that the key strategic cross boundary issues have been addressed. However, in relation to the Birmingham and Black Country HMAs housing shortfall, before any HMA authorities emerging Local Plans are finalised, the housing requirement across the HMA should be agreed in a Memorandum of Understanding. At a strategic level it is clear that as neighbour to two of the authorities (Tamworth and Birmingham) that will not be able to accommodate their own housing requirement that Lichfield will have to accommodate some of their shortfall. What is not clear is how the Birmingham and Black Country HMA area authorities plan to redistribute the requirements arising from the standardised methodology. Under the Duty to Cooperate we would anticipate this being addressed comprehensively across both HMA areas in to enable each LPA to be able to prepare a local plan.</p>	Comments noted, LDC will continue to engage with the GBBCHMA to seek to ensure a consistent approach is applied

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO942	Barratt Homes (Michael Davies for Savills)	2	<p>The evidence base list at Appendix A and the proposed review of key documents such as the SHMA. It will be important for these documents to be available soon in order that they can be properly reviewed and taken into consideration. Until the evidence base documents being updated are made available, we reserve our position in respect of whether they are sound and up to date. In relation to the evidence documents, we have the following points to note on the following documents: Greater Birmingham & Black Country Housing Market Area Growth Studies In Appendix A, LDC have proposed that 'no action' is required in relation to these evidence documents. We disagree with this. At present it is not clear how the HMA shortfall is to be addressed up until 2031. We understand that the G L Hearn Strategic Growth Study (February 2018) recommends various locations across the HMA which could be considered for strategic development. Three of the proposed locations are located within LDC local authority area; 'East of Lichfield', 'North of Tamworth' and 'Around Shenstone'. The report recommends that further technical work be undertaken on the proposed locations. Although this document is not a document prepared specifically for the Lichfield Plan Review, it was commissioned by the LPAs to provide a comprehensive view of the HMAs. Whilst LDC may not wish to adhere to its recommendations, significant work was undertaken to identify these locations therefore we consider that in order to show LDC's commitment to addressing the shortfall, LDC should progress with the further work on these locations and others of its choice to rule out or agree with the Growth Study's findings.</p> <p>Whilst the 2014 based household projections show the total anticipated number of households to emerge in Lichfield between 2016-2026 is 275 per annum further analysis is required to take account of the 2016 based population and household projections.</p> <p>Further work is also needed across the HMA to take account of the standardised methodology for calculating the housing need across both the Birmingham and Black Country HMAs. Whilst Lichfield's annual housing requirement appears to reduce from 410 dwellings per annum to 353 dwellings per annum, there are neighbouring authorities, such as Tamworth and Birmingham that will have significant unmet housing need that needs to be met. Until the housing needs of both HMAs are understood Lichfield cannot conclude what its housing requirement will be. Therefore, in order to have a robust strategy in place the housing requirements and mechanisms (e.g. Memorandum of Understanding) need to be agreed across both HMAs. Furthermore, sensitivity testing of employment requirements across both HMAs will be important for Lichfield (and other LPAs) to take account of when considering the housing growth and spatial distribution.</p> <ul style="list-style-type: none"> - Rural Settlement Sustainability Study <p>We consider that the Rural Settlement Sustainability Study (August 2016) should be updated to reflect the changes brought forward through the Core Strategy and Site Allocations document. In some rural settlements the position will have changed since the study was undertaken and the relative position in terms of the services and facilities of levels of accessibility to these may have changed.</p> <ul style="list-style-type: none"> - Green Belt Review <p>We agree that that a Green Belt Review must be undertaken. In relation to our client's site which is assessed within parcel BE1 of the Supplementary Green Belt Report (November 2016), the report states that "the SHLAA assessed the site as being able to accommodate 589 dwellings, significantly more than is required to meet the LPS housing requirements for Burntwood". The figure of "589 dwellings" has come from two separate promotions of land, SHLAA (2017) reference 494 for 440 dwellings and our client's site, SHLAA reference 404. In our view, these two sites should not have been assessed together as they have not been promoted together and both of the sites do not have to be developed, so the dwelling figure assumed should not be 589 dwellings.</p> <p>The report also states that "Parcel BE1 consists primarily of a large agricultural field, as such there are limited features which could be considered to define a smaller parcel within this context". Again, we strongly disagree with this statement. The land does not comprise one large agricultural field but is made up of various separate land parcels.</p> <p>Due to the incorrect conclusion that Parcel BE1 is comprised of a single land parcel which could be developed for 589 dwellings, this figure was considered too high therefore the report concluded that other more higher performing Green Belt parcels around Burntwood should be considered for release.</p> <p>We request that the updated Green Belt Review reassesses Parcel B1 as separate sites so that it can correctly conclude that this parcel is the lowest performing Green Belt parcel in Burntwood and should therefore be considered for release before the other higher performing parcels around the settlement.</p> <ul style="list-style-type: none"> - Landscape Character Assessment - we agree that a review of the Landscape Character Assessment is required. However, the study is currently a Staffordshire-wide study but we think a more detailed Lichfield District study needs to be undertaken, especially as the Review may involve the release of Green Belt and greenfield sites. - Infrastructure Delivery Plan ('IDP') – although this document is not listed in Appendix A, we note the separate section dealing with the IDP in Appendix D. We consider that LDC need to ensure that the IDP reflects the conclusions of all of the evidence base that is proposed to be reviewed and that it captures infrastructure requirements associated with each site and capture the infrastructure requirements arising from any revised OAN attributed to the HMA requirements and the standardised methodology. - Transport Studies – we consider that this section should specifically refer to the requirement to review the Strategic Transport Assessment ('STA'). The STA should reflect a full OAN and not be retrospectively considered. In addition to the documents listed in Appendix A we also consider that the following additional evidence documents should be reviewed: <ul style="list-style-type: none"> - The National Forest background paper requires updating as it is currently in accordance with the adopted Local Plan Strategy. It will need to be in accordance with the Local Plan Review document. - The Urban Capacity Study should be updated to show the latest housing supply position in the District which includes, when it is known, the housing requirement to address the HMA shortfall and any revisions associated with the standardised methodology. 	Lichfield District forms part of the Greater Birmingham and Black Country Housing Market Area. As part of the duty to co-operate the Council has committed to engaging with its neighbours to meet the needs within the HMA. This will be considered when undertaking a HEDNA.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO943	St Modwens (CBRE)	5	<p>Promoting circa 12ha of employment land at Cricket Lane.</p> <p>Policies Requiring Minor Amendment: Policy Lichfield 6 (South of Lichfield) - Appendix B of the SIO notes that this Policy requires to be updated because development is yet to commence and deliverability is not in line with anticipated timescales. Retention of the existing policy is supported in its allocation of employment development at the Cricket Lane SDA, including the flexibility it provides in terms of employment uses and the layout and form of employment development over the site.</p> <p>Does not support changes to this policy (or to other plan policies) which would have the effect of limiting the opportunity to attract and accommodate a diverse range of employment occupiers and uses to the District. This would run counter to national planning policy and the Government's commitment to secure economic growth through the planning system.</p>	Deliverability of sites within the adopted Plan will need to be considered through the Review process.
SIO944	Pergola Ltd (Mark Dauncey)	1	<p>Promotes land at Sandyway Farm</p> <p>Agree that the 2020-2036 timeframe for the plan is appropriate. There should however be recognition that the plan will need to be kept up to date over this period, with potential reviews every 5 years.</p>	Comments noted
SIO945	Pergola Ltd (Mark Dauncey)	2	<p>Promotes land at Sandyway Farm</p> <p>Strongly believe that a full Green Belt Review is required. The Council cannot rely on previous Green Belt studies because the Local Plan Review will need to address needs of neighbouring authorities and therefore the Green Belt Review will need to consider the most appropriate and sustainable locations to meet these needs.</p>	Comments noted, consideration of a Green Belt Review will be undertaken
SIO946	Pergola Ltd (Mark Dauncey)	12	<p>Promotes land at Sandyway Farm</p> <p>Believe in order to meet the unmet needs arising from the GBHMA Green Belt boundaries need to be reviewed and sites identified for housing on the edge of settlements given that there is now finite capacity within most urban areas to deliver significant levels of growth. Lichfield City is the most sustainable location to meet future growth needs and land on the edge of the settlement should be considered for release from the Green Belt and allocated for housing.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This will include a Green Belt Review
SIO947	Pergola Ltd (Mark Dauncey)	23	<p>Promotes land at Sandyway Farm</p> <p>Supports a growth strategy that would see the majority of new housing towards Lichfield City given that it is most sustainable settlement, it benefits from train services to Birmingham. Consequently, it provides the most sustainable option to meeting growth needs of the GBHMA. Locations around the edge of Lichfield should be considered for release from Green Belt and allocated for housing. Pergola supports the allocation of land at Sandyway Farm</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO948	St Modwens (CBRE)	10	<p>Table 5.1 sets out 15 Strategic Objectives for the Local Plan. Objective 8 relates to Employment Opportunities and in line with the comments made elsewhere in this response, it is recommended that this objective be expanded as follows (new text shown <u>underlined</u>, text to be deleted shown as <i>italic</i>):</p> <p>"Employment Opportunities: To ensure that employment opportunities within the District are created through <u>providing a diverse and commercially attractive portfolio of employment opportunities which promote</u> the development of new enterprise and <i>the support the expansion</i> and diversification of existing businesses, to <u>deliver economic growth and investment, and</u> meet the identified needs of local people.</p>	Comments noted, these suggestions will be considered when updating the strategic priorities.
SIO949	Pergola Ltd (Mark Dauncey)	24	<p>Promotes land at Sandyway Farm</p> <p>Supports a growth strategy that would see the majority of new housing towards Lichfield City given that it is most sustainable settlement, it benefits from train services to Birmingham. Consequently, it provides the most sustainable option to meeting growth needs of the GBHMA. Locations around the edge of Lichfield should be considered for release from Green Belt and allocated for housing. Pergola supports the allocation of land at Sandyway Farm</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO950	Pergola Ltd (Mark Dauncey)	25	<p>Promotes land at Sandyway Farm</p> <p>Supports a growth strategy that would see the majority of new housing towards Lichfield City given that it is most sustainable settlement, it benefits from train services to Birmingham. Consequently, it provides the most sustainable option to meeting growth needs of the GBHMA. Locations around the edge of Lichfield should be considered for release from Green Belt and allocated for housing. Pergola supports the allocation of land at Sandyway Farm</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO951	Fosseway Investments Ltd (Mark Dauncey)	1	Promotes land north of Fosseway Lane Agree that the 2020-2036 timeframe for the plan is appropriate. There should however be recognition that the plan will need to be kept up to date over this period, with potential reviews every 5 years.	Comments noted
SIO952	Fosseway Investments Ltd (Mark Dauncey)	2	Promotes land north of Fosseway Lane Strongly believe that a full Green Belt Review is required. The Council cannot rely on previous Green Belt studies because the Local Plan Review will need to address needs of neighbouring authorities and therefore the Green Belt Review will need to consider the most appropriate and sustainable locations to meet these needs.	Comments noted, consideration of a Green Belt Review will be undertaken
SIO953	Pergola Ltd (Mark Dauncey)	12	Promotes land north of Fosseway Lane Believe in order to meet the unmet needs arising from the GBHMA Green Belt boundaries need to be reviewed and sites identified for housing on the edge of settlements given that there is now finite capacity within most urban areas to deliver significant levels of growth. Lichfield City is the most sustainable location to meet future growth needs and land on the edge of the settlement should be considered for release from the Green Belt and allocated for housing.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This will include a Green Belt Review
SIO954	St Modwens (CBRE)	12	To attract large inward investment opportunities, land identified for major new employment development should be of sufficient scale, be readily available, and be free from significant environmental, infrastructure and other development constraint. Local plan policies (and the development management decisions which follow) should not seek to unduly restrict the scale, form and nature of proposals which may come forward. For many sectors, such as distribution and logistics which is a key employer for the District, being in locations which are very well connected to the strategic transport network is also of critical importance (this fact is also recognised at paragraph 2.21 of the SIO). Our Client's land at Cricket Lane performs very well in this regard, with prominence and immediate access to the A38, a major arterial route through the District. Such factors are key commercial and locational considerations that drive inward investment decisions and should weigh heavily in any assessment of the area's employment land portfolio and associated planning policies. The amount and type of land needed to meet the area's future employment and economic growth needs should be robustly assessed and supported, including in the context of future housing and population growth. Also, ensuring a 'spread' of sites in terms of scale and location will be important to provide a wide and deliverable portfolio.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy and quantum for growth including both housing and employment growth. This will be informed by a range of evidence.
SIO955	Fosseway Investments Ltd (Mark Dauncey)	23	Promotes land north of Fosseway Lane Supports a growth strategy that would see the majority of new housing towards Lichfield City given that it is most sustainable settlement, it benefits from train services to Birmingham. Consequently, it provides the most sustainable option to meeting growth needs of the GBHMA. Locations around the edge of Lichfield should be considered for release from Green Belt and allocated for housing.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO956	St Modwens (CBRE)	13	To attract large inward investment opportunities, land identified for major new employment development should be of sufficient scale, be readily available, and be free from significant environmental, infrastructure and other development constraint. Local plan policies (and the development management decisions which follow) should not seek to unduly restrict the scale, form and nature of proposals which may come forward. For many sectors, such as distribution and logistics which is a key employer for the District, being in locations which are very well connected to the strategic transport network is also of critical importance (this fact is also recognised at paragraph 2.21 of the SIO). Our Client's land at Cricket Lane performs very well in this regard, with prominence and immediate access to the A38, a major arterial route through the District. Such factors are key commercial and locational considerations that drive inward investment decisions and should weigh heavily in any assessment of the area's employment land portfolio and associated planning policies. The amount and type of land needed to meet the area's future employment and economic growth needs should be robustly assessed and supported, including in the context of future housing and population growth. Also, ensuring a 'spread' of sites in terms of scale and location will be important to provide a wide and deliverable portfolio.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy and quantum for growth including employment growth. This will be informed by a range of evidence.
SIO957	Fosseway Investments Ltd (Mark Dauncey)	24	Promotes land north of Fosseway Lane Supports a growth strategy that would see the majority of new housing towards Lichfield City given that it is most sustainable settlement, it benefits from train services to Birmingham. Consequently, it provides the most sustainable option to meeting growth needs of the GBHMA. Locations around the edge of Lichfield should be considered for release from Green Belt and allocated for housing.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO958	Fosseway Investments Ltd (Mark Dauncey)	25	Promotes land north of Fosseway Lane Supports a growth strategy that would see the majority of new housing towards Lichfield City given that it is most sustainable settlement, it benefits from train services to Birmingham. Consequently, it provides the most sustainable option to meeting growth needs of the GBHMA. Locations around the edge of Lichfield should be considered for release from Green Belt and allocated for housing.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO959	Barratt Homes (Michael Davies for Savills)	4	We agree with the policies listed in the table proposed to be significantly amended or replaced. Core Policy 8 is listed in Appendix B but is missing from the tables.	Comments noted
SIO960	Barratt Homes (Michael Davies for Savills)	5	We agree with the policies listed in the table proposed for minor amendment.	Comments noted
SIO961	Barratt Homes (Michael Davies for Savills)	6	It is considered that the following policies identified as requiring “no change” will require updating to reflect changes that have occurred: - Policy Lichfield 5 - East of Lichfield (Streethay) - Policy Burntwood 5 : East of Burntwood - Policy North of Tamworth - Policy East of Rugeley	Comments noted
SIO962	Barratt Homes (Michael Davies for Savills)	7	It is considered that an additional policy dealing with the requirement for a local plan review. This would cover the need to undertake a timely review in accordance with the NPPF requirement to review at least once every five years or where the review plan is failing to maintain a 5 year housing supply.	A review trigger would only be necessary were there something specific that might trigger a review ahead of the NPPF 5 year review timetable
SIO963	Barratt Homes (Michael Davies for Savills)	8	We consider that the main issues should place clearer and greater emphasis on Lichfield’s role in meeting the housing and employment needs of the HMA not just the District’s housing need. Table 3.1 should be amended to include clear reference to the requirements of the wider HMA and what impact this has on the overall housing target for Lichfield.	The Review does include reference to the GBHMA shortfall. The Review does include reference to the GBHMA shortfall.
SIO964	Barratt Homes (Michael Davies for Savills)	9	We consider that reference should be made to Lichfield District’s position in the wider sub region / HMAs and what role the Council sees the District playing in supporting both the Birmingham and the Black Country HMAs growth. This may include a vision for increased investment in public transport and other key infrastructure to support a growing community. The vision may also widen to consider the opportunities arising from key investment in HS2 and the Commonwealth Games in Birmingham.	Noted sub-regional, regional and national initiatives will need to be assessed to identify whether there is scope to incorporate within the vision
SIO965	Barratt Homes (Michael Davies for Savills)	10	We consider that the strategic objectives set out in table 5.1 of the Scope, Issues and Options Plan fail to convey how the Plan seeks to deal comprehensively with the pressures arising from the Birmingham and Black Country HMAs. Strategic Priority 6 refers only to meeting the needs of residents in Lichfield District. Without clarity on the additional housing that Lichfield may have to provide to meet the Standardised Methodology for the Objectively Assessed Need (‘OAN’) and the shortfall in requirements arising from the wider HMAs, the objectives currently set cannot be considered to be appropriate. The scale of additional housing requirement (as yet undefined) will need to be supported by the 15 objectives identified being adopted to ensure the comprehensive plan can be delivered. Any major revision to the housing requirement for the District could have significant implications for the provision of the priorities listed below therefore without a clear understanding of the Council’s housing need, the strategic priorities proposed cannot be confirmed as still being relevant: · Sustainable communities; · Rural communities; · Climate change; · Infrastructure; · Sustainable transport; · Meeting housing needs; · Economic prosperity; · Employment opportunities; · Centres; · Tourism; · Healthy & safe lifestyles; · Countryside character; · Natural resources; · Built Environment; · High quality development.	The Review does include reference to the GBHMA shortfall. However it is recognised that the Plan Review will need to deal with cross boundary issues

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO966	Barratt Homes (Michael Davies for Savills)	11	The revised NPPF (March 2018) sets out the importance of making more effective use of land and buildings. It proposes setting minimum density standards in town and city centres and around transport hubs. We consider that setting a minimum density for town and city centres and around transport hubs within the District could be appropriate, however we do not consider that it is appropriate to set a density for the rest of the District. Sites should be assessed on a site by site basis because of site specific circumstances, such as topography, heritage, landscape and character constraints. Therefore if a blanket approach on density is taken by LDC, it could lead to inflexibility and be unhelpful in achieving good design. We consider that a blanket density policy should not be included in the Local Plan Review document and density should be agreed on a site by site basis which has taken into consideration site specific circumstances.	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO967	Barratt Homes (Michael Davies for Savills)	12	The Birmingham Development Plan (adopted January 2017) identified an unmet need of 37,900 dwellings for the period 2011-2031 which yet to be re-distributed across the HMA. Furthermore, the Greater Birmingham & Black Country HMA Strategic Growth Study (February 2018) identifies an updated housing need of 250,000-310,000 dwellings between 2011-2036 for the HMA. This latest assessment also identifies the potential for approximately 22,000 dwellings of unmet housing need from the Black Country Authorities. We consider that Lichfield should continue to work with the other LPAs in both the Birmingham and Black Country HMA areas to determine the following: i) What the standardised methodology means for the whole of each HMA area in terms of housing need; ii) Which LPAs cannot meet their Full Objectively Assessed Housing Need (FOAN) and what level of housing shortfall needs to be met by the other LPAs in the respective HMA iii) Use a Memorandum of Understanding (MoU) to agree which LPAs will take the housing shortfall, how many houses each LPA will take and then agree on the spatial strategy for absorbing the housing shortfall.	Comments noted. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield.
SIO968	Barratt Homes (Michael Davies for Savills)	21	Yes we support this growth option. As a minimum, future growth should be directed to the settlements of Lichfield City and Burntwood as they are the most sustainable settlements in the District, however this priority should be balanced with some development to other smaller sustainable settlements. Sites adjacent to both of the key existing settlements should be assessed as potential residential development options. Although we consider that Lichfield City and Burntwood are the most sustainable settlements and should be the location of the majority of future growth, we consider that in order to meet the housing needs of the District and the HMA, a wide variety of sites will be required which may range from small (1 - 25 dwellings) sites in a rural area to medium / large (26 – 500 dwellings) sites on the edge of Lichfield and Burntwood as well as new settlement opportunities (1,500+ dwellings). The new settlement could be adjacent to an existing settlement or stand alone. The Residential Growth Option for the District should incorporate all of the options set out in this Scoping Issues and Options consultation. We support paragraph 8.7 of the Scoping, Issues and Options document which states that as the second largest settlement within the District, Burntwood would be a potential focus for growth. The paragraph also sets out that land adjacent to Burntwood within the Green Belt may need to be released for development. We support the requirement for LDC to update the Green Belt Review. We consider that as there is a significant HMA shortfall that very special circumstances exist to justify the release of land from the Green Belt within the District and we consider that the Green Belt that is released should be adjacent to the most sustainable settlements within the District, Lichfield and Burntwood.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO969	Barratt Homes (Michael Davies for Savills)	22	An additional opportunity that we consider is important to include on this Growth Option in the Local Plan Review is not only will new housing be focussed within / adjoining to the built up area but they will be in close proximity to a range of key facilities and services including schools and shops. We consider that where sites are located in highly sustainable locations adjacent to key facilities / services, they should be scored higher than those that are further away. Barratt's site off Rugeley Road, Burntwood is located adjacent to a primary school (Fulfen Primary School) and approximately 480m from a District Centre which offers a range of services and facilities.	Comments noted.
SIO970	Barratt Homes (Michael Davies for Savills)	23	As already stated in our response to Question 21, we consider that the majority of growth should be located around Lichfield City and Burntwood however Residential Growth Option 2 will assist in preventing rural areas within the District from stagnating which has been noted as a challenge of Residential Growth Option 1. Therefore focussing (placing a major emphasis) on development around existing towns can only provide part of a comprehensive solution and will still require major opportunities on the urban edge of the major settlements of Lichfield and Burntwood.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO971	Barratt Homes (Michael Davies for Savills)	26	Whilst this Residential Growth Option includes the most sustainable urban centres of Lichfield and Burntwood, which is where we consider the majority of development should be directed, some limited growth could be located adjacent to existing rural settlements. Where growth is directed to rural settlements these should only be for a scale of development that can be accommodated sustainably according to the level of facilities and service provision available (or proposed) and not a simply a distribution of the housing need against all of the settlements across the District.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO972	Barratt Homes (Michael Davies for Savills)	28, 29, 30	We support the proposed locations for a potential new settlement. We consider that any new settlement needs to be in close proximity to existing transport links, services and facilities to ensure that it is as sustainable as possible. New settlements provide LDC with an opportunity to be able to address a significant proportion of their housing requirement (once it is finalised) however, as we have stated above, we still consider that a range of sites at different scales are required in order to address the District and HMA's housing needs.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO973	Barratt Homes (Michael Davies for Savills)	37	We consider that the main focus for new residential development should be located within and adjacent to Lichfield and Burntwood as these settlements are the most sustainable within the District. This should ensure that the needs of the whole District and the HMA are met.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO974	Barratt Homes (Michael Davies for Savills)	38	As a minimum the growth should be supported by commensurate infrastructure. Until the scale and distribution of the HMA housing shortfall is known the level of infrastructure that is required and the structure of the IDP cannot be confirmed.	Comments noted
SIO975	Barratt Homes (Michael Davies for Savills)	39	Whilst the prioritisation of infrastructure may be a useful tool this would be subject to how the infrastructure is prioritised and what is used to determine priorities. Neither the current or draft NPPF seeks such an approach to infrastructure prioritisation. However, what is more important is that the plan first identifies the scale of development it is seeking to deliver and engagement with key infrastructure and utilities providers is then undertaken to capture the existing capacity and more accurately determine what enforcement or new infrastructure provision is required to support the planned housing and employment growth.	Whilst it is noted that prioritisation is not a requirements the District Council operates a CIL charge, propitiation within the IDP will enable the informed distribution of funds and the development of a programme of needs across the plan period enabling a process that supports delivery of appropriate requirements which address evidenced need.
SIO976	Barratt Homes (Michael Davies for Savills)	40	The prioritisation of infrastructure is not identified as a requirement of the NPPF and therefore the definition is not relevant.	Whilst it is noted that prioritisation is not a requirements the District Council operates a CIL charge, prioritisation within the IDP will enable the informed distribution of funds and the development of a programme of needs across the plan period enabling a process that supports delivery of appropriate requirements which address evidenced need. As the IDP is reviewed the status of project prioritisation will also be revisited.
SIO977	Barratt Homes (Michael Davies for Savills)	Whole Document	<p>On behalf of Barratt West Midlands ('Barratt'), we have prepared the following submission in response to the Lichfield Local Plan Review – Scope, Issues and Options consultation.</p> <p>Barratt are promoting a site off Rugeley Road, Burntwood for residential development. We have set out the background to the site in the section below.</p> <p>Site Context</p> <p>Our client's land is located to the east of Rugeley Road, Burntwood and is approximately 6 hectares (15 acres). The site is bounded by Rugeley Road to the west, Fulfen Primary School to the south and agricultural fields to the north and east. A site location plan is attached for your reference. The site is located within the Green Belt. However, in Lichfield District Council's ('LDC') Supplementary Green Belt Report (November 2016), our client's site was reviewed under parcel Burntwood East 1 (BE1) and was assessed as being moderately performing overall. Parcel BE1 was the only moderately performing parcel which was assessed around Burntwood, all of the other parcels that were assessed were considered to be 'important'. Burntwood is the second largest and most sustainable settlement in the District and the site is approximately 480m from a local centre which offers a range of services and facilities. We consider that this site is located within a sustainable location adjacent to a sustainable settlement and is deliverable therefore it should be allocated for residential development in the Local Plan Review document.</p>	Site is outside current settlement boundary but is adjacent to sustainable settlement of Burntwood and in close proximity to services and facilities. Lack of public transport in this location. Within Greenbelt. Does not wholly comply with current development plan policies in the Local Plan, however, site falls within broad area for search for assessment of sites which could contribute to sustainable mixed communities. SCC highlight a negative impact on local road network requiring investment in mitigation measures. Loss of Grade 3 Agricultural Land may need justification. Site falls within the FOM and contributions to these projects may be required. Site has potential for protected species. An SSSI and BAS are within 1km and the impact on it may need further investigation. Site is within the Cannock Chase zone of influence therefore mitigation may be required.
SIO978	Metacre Ltd (GVA)	18	We agree that Burntwood Town Centre requires investment (including public sector investment) and targeted regeneration. This must be underpinned and guided by a clear and deliverable vision which, to be fully effective, should be DPD-led.	Comments noted.
SIO979	St Philips (GVA)	Whole Document	<p>Promotes land at Fradley Lane for residential development. The site is 7.7ha and is currently agricultural land. It has previously been included in 2017 SHLAA (Ref: 412 and 666). There are no known constraints which would preclude development subject to appropriate mitigation measures. Confirms the site capacity is approximately 150 units.</p> <p>Confirms the site is available, a suitable location for development and achievable with a reasonable prospect that housing will be delivered within 5 years. Provides a housing trajectory. The site is available now and not subject of any requirements for third party land.</p>	Outside village boundary but is adjacent to a sustainable settlement as identified within the adopted Local plan Strategy. Outside settlement. Does not wholly comply with current development plan policies in the Local Plan. However site falls within broad area for search for assessment of sites which could contribute to sustainable mixed communities. Loss of Grade 3 Agricultural Land may need justification. An SBI & BAS are within 1km and the impact on them may need further investigation. Site is within the Cannock Chase zone of influence therefore mitigation may be required. A pipeline is adjacent to the site.
SIO980	Metacre Ltd (GVA)	21	<p>Focusing development around the main urban areas of Lichfield and Burntwood is not only an appropriate option it is the most appropriate option. It is the most sustainable solution and is the option that will deliver the greatest gains in environmental, social and economic terms (see Sustainability Assessment, Section 5).</p> <p>That said, and assuming the Council develops its spatial strategy around this Option, it should take care to avoid over-reliance on urban capacity (which the Council itself accepts is finite and will continue to reduce), and upping densities on sites within the urban areas (particularly where this might be at the expense of creating high quality, attractive living environments). The reality is that both Lichfield and Burntwood will need to expand outwards and this will almost certainly necessitate alterations to the Green Belt boundary (in Burntwood this will definitely be the case). However, such changes are inevitable and necessary in order to deliver what are, ultimately, sustainable patterns of growth. Of course, when considering amendments to the Green Belt boundary, it will be necessary to look well beyond the Plan period and to make alterations that endure.</p> <p>In addition, when developing a strategy based on this Option, the Council must strike the right balance between levels of growth directed to the main urban areas and levels of growth allowed elsewhere in the district. In our view, the present strategy, which directs approximately 34% of housing growth to the rural settlements, is inappropriate. The balance, in the new Local Plan, needs to be more heavily weighted towards Burntwood (and therefore the main urban areas overall) than it is currently.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO981	Metacre Ltd (GVA)	22	<p>Under 'opportunities' the Council should reference proximity to services and facilities and the likelihood that this Option will keep to a minimum journey lengths and times by unsustainable modes of transport. The Council should also note that there are usually far greater opportunities, on the back of new development, to enhance services, facilities and infrastructure in settlements that are already reasonably well served. What is far more difficult is making an unsustainable location sustainable (i.e. attempting to use a relatively modest development on the edge of a small village to support or expand local service provision – this, in our experience, very rarely works unless the scale of development contemplated is significant).</p> <p>Insofar as 'challenges' are concerned, we consider these to be over-stated. If conceived and designed properly, developments required under Option 1 would be likely to enhance public access to open spaces on the edges of settlements (rather than make this more difficult – most open land on the edges of the main settlements is not accessible to the public) and would deliver mitigation, where necessary, in respect of services / infrastructure and heritage assets.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO982	Landowners at Fradley and Alrewas (Wardell Armstrong)	Whole Document	Representation made on behalf of BDW Trading Ltd., the Leavesley Group and the Gilmour Family. These parties have an interest in the land around Fradley and Alrewas (herein referred to as Brookhay) as identified in attached drawing.	Comments noted.
SIO983	GVA on behalf of Metacre Ltd	23	Do not agree that this is an appropriate option for growth. It is inherently less sustainable than Option 1. This Option is also predicated on the theory that directing growth towards certain rural settlements will support existing services and facilities and / or make them more sustainable. Yet there is no evidence presented by the Council which supports such a proposition. It will also result in the need for a greater number of alterations to the Green Belt boundary and therefore greater impact.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO984	GVA on behalf of Metacre Ltd	26	Residential Growth Option 3 will not deliver sustainable patterns of development and is not an appropriate option for growth. It should not be considered further.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO985	Landowners at Fradley and Alrewas (Wardell Armstrong)	2	<p>Promoting land around Alrewas and Fradley referred to as Brookhay.</p> <p>The SHMA should be fully updated given the last publication was in 2012. Key that an IDP is also prepared to guide the provision of infrastructure in order to support the delivery of strategic development.</p>	Consideration to undertaking a HEDNA will be undertaken
SIO986	GVA on behalf of Metacre Ltd	30	The most significant challenges which are deliverability and feasibility are overlooked. Given the scale and complexity of the difficulties presented by new settlement proposals, it would be unwise (and almost certainly unsound) of the Council to rely upon the delivery of a new settlement (or even part of a new settlement) in the forthcoming Plan period. It is critical that the Council focuses on deliverable propositions that can yield new dwellings quickly. A new settlement may legitimately play a part in the future growth of the District, and it may be appropriate for the Council to start planning for it now, but it is most unlikely that a new settlement will deliver significant numbers of new homes by 2036.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO987	GVA on behalf of Metacre Ltd	31	Yes. Burntwood in particular needs to grow and this growth needs to comprise a balance of housing and employment. Moreover, this option (Employment Growth Option 1) is plainly the most sustainable and would drive employment growth in the locations that are closest to the main centres of population and the locations with the best infrastructure.	Comments noted. As this consultation document stated, Burntwood; "will be a main focus for investment"; and the SHLAA and ELAA are considered together.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO988	Landowners at Fradley and Alrewas (Wardell Armstrong)	3	<p>Promoting land around Alrewas and Fradley referred to as Brookhay.</p> <p>Unmet housing need is a key cross boundary issue that has been identified by LDC. Well established significant shortfall in planned provision to meet housing requirements in Birmingham, proposed that this shortfall is met elsewhere in the GBHMA through Duty to Cooperate. The calculated HMA housing land supply baseline is based on the assumption that objectively assessed housing need will remain constant throughout the Local Plan period (until 2031). As such base evidence has been projected into the future with no consideration for contextual situations which may impact growth. This does not take into consideration that each local authority will undertake a Local Plan review, as part of the Duty to Cooperate.</p> <p>It is contended that the Birmingham Development Plan figure for unmet need, as endorsed by an Independent Planning Inspector, is the starting point for any consideration of Lichfield's objectively assessed housing need and not the subsequently 'capped' figure (paragraph 6.18 of the Lichfield District Local Plan Review 2020 – 2036 Scope Issues and Options). It is noted that housing need methodology is in a state of flux, however given the special circumstances of the Greater Birmingham HMA, it seems disingenuous for a standardised methodology to be utilised.</p> <p>It is important to note that the Birmingham Development Plan considers housing need until 2031. The Lichfield District Local Plan Review 2020- 2036 will cover an additional 5 year period. It is necessary to consider unmet need arising from Birmingham during the additional 5 years period not covered by the Birmingham Development Plan. The only comprehensive study of this need derives from the Greater Birmingham HMA Strategic Growth Study, which suggests that there is an additional shortfall of 32,705 (2031 – 2036). This results in unmet housing need of 102,655 across Lichfield District's Local Plan period.</p> <p>Table 1 indicates at least 5% of the housing need across the HMA should be apportioned to Lichfield. Assuming this apportionment, this would mean that Lichfield would need to deliver 5,133 further dwellings in addition to its own objectively assessed need. Any apportionment of unmet housing need will need to reflect the capacity for housing available outside of Birmingham. It is noted that a number of other local authorities (Cannock Chase and Tamworth) that are constrained in terms of housing delivery. Therefore it is reasonable to conclude that Lichfield's apportionment attributed will need to be significantly greater than 5%.</p> <p>Lichfield has been identified as a sustainable area for strategic development along with three others, which has been identified as the principle method of meeting the unmet need arising from Birmingham. Brookhay represents a sustainably located strategic option to deliver unmet housing need outside of the Green Belt. There is a clear and demonstrable need which necessitates taking Brookhay forward to the next stage of the Draft Local Plan.</p>	Comments noted, LDC will continue to engage with the GBBCHMA to seek to ensure a consistent approach is applied
SIO989	GVA on behalf of Metacre Ltd	38	Yes, although the Council should also include within the IDP an estimate of the likely cost of each piece of infrastructure listed in the document, together with an indication of how the Council expects these cost to be met.	Comments noted: The project description jointly with the 'What' section will address 'how'. Delivery Leads costs and funding streams will be identified as they become apparent.
SIO990	GVA on behalf of Metacre Ltd	39	Prioritisation is helpful. Indeed, it is likely to be necessary in circumstances where the Council is expecting the private sector to deliver infrastructure. If infrastructure is not essential (i.e. necessary in order to make a proposed development acceptable in planning terms), it is unlikely to be possible for the Council to make it the subject of a planning condition or obligation.	Comments noted
SIO991	GVA on behalf of Metacre Ltd	40	The Council may need to reconsider its definitions. We recommend that the Council considers reducing the number of categories that it uses to 2 and that these be entitled 'critical' or 'essential' and 'desirable'. When applying these to infrastructure listed in the IDP, care will need to be taken to ensure that infrastructure is appropriately categorised and that, in particular, desirable infrastructure is not listed as essential.	Comments noted: Agree the assessment of identified categorise will require the support of a robust assessment framework which will ensure that the is clarity surrounding categorise.
SIO992	GVA on behalf of Metacre Ltd	41	No, there is no mention in Appendix A of: energy (other than low carbon energy generation), digital infrastructure, health services, education, emergency services, or waste management.	Comments noted
SIO993	Pegasus on behalf of Mr D Wright	1	Yes, it is appropriate. The 16 year timeframe for strategic policies is considered appropriate. In addition, the plan period to 2036 would tie in with the Great Birmingham HMA Strategic Growth Study. We do however believe that there should be a policy commitment to review policies every 5 years to ensure that the plan is kept up to date and in accordance with the new NPPF (paragraph 23).	Comments noted

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO994	Pegasus on behalf of Mr D Wright	2	<p>The Local Plan must be based on adequate, up-to-date and relevant evidence. There are a number of evidence base studies which require updating: Greenbelt, housing, rural sustainability, Cannock Chase SAC, infrastructure and viability. In light of the Local Plan Review having committed to consider housing needs for the Birmingham and Black Country HMA it is considered that a comprehensive Green Belt Review is required. The 2016 population and household projection data will be published in 2018. Once this is available it is important that this is used as the baseline upon which future housing growth is identified. When comparing the figures arrived at by the SHMA process and the Standard Methodology, it is clear that the figures produced by the new methodology arrive at a lower figure. It is recommended that further sensitivity testing of the Standard Methodology is undertaken. The Council's Rural Settlement Sustainability Study requires updating. The study acknowledges that it captures a "moment in time" and thus for some settlements where development has recently occurred, the scorings will have changed. This may result in further amendments to the hierarchy of settlements in the spatial strategy. A review of the Cannock Chase SAC Evidence Base concluded that the approach remained fit for purpose for currently adopted local plans, but that there are some aspects of the approach that should now be the focus of a full review and upgrade to a more comprehensive strategy in the near future. This approach is fully supported. Although it is recognised that the Infrastructure Delivery Plan (IDP) is a living document it is considered that there are a number of evidence base studies on infrastructure which will require updating to assess the emerging spatial options. Other pieces of evidence relating to infrastructure which are considered to now be out of date and in need of updating are those studies relating to transport, indoor sports and recreation, playing pitches, health and well-being, air quality, biodiversity, renewable and low-carbon energy and water resources and supply. It is considered of paramount importance that a Viability Assessment is undertaken alongside the Local Plan Review.</p>	<p>"Consideration to undertaking a HEDNA will be undertaken</p> <p>Comments noted, consideration of a Green Belt Review will be undertaken</p> <p>Consideration of updating the RSSS will be undertaken</p> <p>Comments noted viability evidence will be considered"</p>
SIO995	St Philips (GVA)	1	<p>Promotes land at Fradley Lane</p> <p>Proposed plan period is considered appropriated. It is intended replacement of the adopted Local Plan in 2020 aligns with legislative requirements to review plans within 5 years of adoption and the plan period would be consistent with that recommended in the NPPF and emerging NPPF.</p> <p>It may be prudent for the Council to reference a commitment to undertake an early review within the LPR given the nature and intensity of cross-boundary issues within the GBHMA.</p>	Comments noted
SIO996	Landowners at Fradley and Alrewas (Wardell Armstrong)	7	<p>Promoting land around Alrewas and Fradley referred to as Brookhay.</p> <p>Addition of a Gardens Settlement policy is required, in accordance with paragraph 55 of the NPPF which notes "the supply of new homes can sometimes be best achieved through planning for larger scale development..."</p> <p>A new policy relating to major infrastructure delivery referencing the IDP as identified in Table B2 of the LPR.</p>	The Council will give these matters consideration as part of the review, in particular focusing on the requirements arising from the NPPF and NPPG.
SIO997	St Philips (GVA)	2	<p>Promotes land at Fradley Lane</p> <p>It will not be appropriate to reply on existing evidence based documents namely the Southern Staffordshire District's Housing Market Needs Study, SHMA or t GBHMA work to set an appropriate housing requirement for the plan period. The Government has proposed a new standard methodology to assess housing need. The Council should follow the three step process to calculating housing need which is set out in the NPPF consultation proposals.</p> <p>The Standard Method of 340 dwellings per annum is illustrative of the position at September 2017 and subject to change therefore the assessment of housing need must be kept up to date as the plan advances. Whilst the application of the Standard Method may obviate the need for the Council to commission a new SHMA it will still need to ensure it works collaboratively within other HMA authorities to agree the total need and level of upward adjustment of the District's housing requirement.</p> <p>GBHMA Strategic Growth Study provides a basis upon which matters around the distribution of supply warrant further assessment by the Council. The Council should undertake an updated assessment of the proportion of the housing requirement which can realistically be expected to be accommodated on windfalls, appropriate density of development that could be achieved in different areas of the District and extent to which growth can be accommodated on the least environmentally constrained sites.</p> <p>Council need to update the following evidence - viability, infrastructure and sustainability.</p>	<p>Consideration to undertaking a HEDNA will be undertaken</p> <p>Comments noted, consideration of a Green Belt Review will be undertaken</p> <p>Consideration of updating the RSSS will be undertaken</p> <p>Comments noted viability evidence will be considered</p>
SIO998	Landowners at Fradley and Alrewas (Wardell Armstrong)	8	<p>Promoting land around Alrewas and Fradley referred to as Brookhay.</p> <p>Issue 1 Meeting the Strategic Housing & Employment requirements should include reference to "cross boundary needs".</p>	Comments noted
SIO999	Landowners at Fradley and Alrewas (Wardell Armstrong)	9	<p>Promoting land around Alrewas and Fradley referred to as Brookhay.</p> <p>The Local Plan Review should refer to meeting strategic housing needs by prioritising development in sustainable locations.</p>	Comments noted, an assessment of where growth will take occur needs to be undertaken

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1000	Landowners at Fradley and Alrewas (Wardell Armstrong)	10	Promoting land around Alrewas and Fradley referred to as Brookhay. The Local Plan Review should refer to meeting strategic housing needs by prioritising development in sustainable locations.	Comments noted, an assessment of where growth will take occur needs to be undertaken
SIO1001	Landowners at Fradley and Alrewas (Wardell Armstrong)	12	Promoting land around Alrewas and Fradley referred to as Brookhay. LDC should formally agree an apportionment of housing delivery resulting from the unmet supply from across the GBHMA. This agreement should reflect the capacity that Lichfield has for housing in relation to other local authorities within the HMA. Development should then be directed to the most sustainable locations. Throughout the HMA there is clearly not enough previously developed land of a notable nature to cater for unmet supply, therefore greenfield sites are necessary. Due to the protection afforded to the Green Belt by the National Planning Policy Framework (NPPF) and the draft Revised NPPF, it is a clear principle that development should be directed away from these locations unless exceptional circumstances can be justified. In view of the scale of unmet need, large strategic sites are necessary to meet need arising from outside of Lichfield District Council, notwithstanding its own needs. Brookhay is a sustainable location for strategic housing delivery which is required to meet unmet housing need.	Comments noted. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield.
SIO1002	Landowners at Fradley and Alrewas (Wardell Armstrong)	13	Promoting land around Alrewas and Fradley referred to as Brookhay. LPR requires major, strategic developments to provide a reasonable proportion of their site as serviced plots for self-build and custom house building. This will supply effective delivery of a Government priority.	Comments noted. This will be considered further as the Local Plan Review progresses and will be informed by a range of evidence.
SIO1003	Landowners at Fradley and Alrewas (Wardell Armstrong)	21	Promoting land around Alrewas and Fradley referred to as Brookhay. The Urban Capacity Study (Lichfield District Council, 2016) outlines that there is a 728 delivery undersupply in terms of the adopted Local Plan Strategy Requirement. This undersupply does not take into consideration changes to OAN from the Local Plan Review process or unmet housing need from Birmingham. Therefore, development outside of the existing urban boundaries is certain, not only to meet need related to Lichfield, but also from Birmingham. It should be noted that the majority of options identified within the Lichfield District Local Plan Review: Scope, Issues & Options are located in the Green Belt or on boundaries with or in neighbouring local authorities. The Green Belt is afforded significant protection within the NPPF and this protection is set to increase within the Revised NPPF. It is considered that there are sufficient sustainable housing growth options in Lichfield District that would avoid the need to develop sites outside of the district boundary. Town Focussed Growth will only be appropriate within existing urban boundaries. Where development is directed outside of the urban boundaries it will need to be within Lichfield and outside of the Green Belt. It is unlikely that this option will supply sufficient housing to meet housing need related to Lichfield, notwithstanding the unmet need from Birmingham. The option would clearly need to be combined with at least one and probably all the other development options in order to generate the amount of housing growth required.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO1004	Pegasus on behalf of Mr D Wright	3	Concerns remain about how the housing shortfall will be addressed across the HMA, particularly with regard to timing. It is noted that the application of the standard method for assessing local housing needs does not consider cross boundary needs as well as other considerations. It is the case that Lichfield's overall housing figure for the Local Plan Review, given its proximity to neighbouring authorities that cannot accommodate their housing needs, should be reflective of strategic cross boundary housing needs and be a higher number than that set out in the DCLG standard methodology.	Comments noted, LDC will continue to engage with the GBBCHMA to seek to ensure a consistent approach is applied
SIO1005	St Philips (GVA)	3	Promotes land at Fradley Lane The document acknowledges the cross-boundary issue of unmet housing needs arising within the HMA but does not provide detail to demonstrate how the Council intends to meet the Duty to Cooperate. The Council needs to ensure that there is an agreed mechanism in place with which to address unmet need arising within the HMA which goes beyond mere discussion. There is a need for transparent and continuous dialogue between the Council and other HMA authorities supported by published minutes and actions, culminating in the agreement of a MoU. The MoU should be kept under review subject to adjustments being made to assessment of housing need and should form the precursor to a SoCG, whose agreement by authorities will be necessary to demonstrate that the Duty has been complied with. It must be for the Council together with other HMA authorities to determine what is appropriate in terms of accommodating share of unmet need arising within the HMA. A key determinant of the District's ability to accommodate growth beyond its own objectively assessed needs will be the extent of suitable land available which is not within the Green Belt or subject to environmental designations. The ability for the Council to accommodate strategic growth in sustainable locations outside of Green Belt such as at Fradley should weigh heavily in the planning balance when considering where unmet need can and should be accommodated.	Comments noted, LDC will continue to engage with the GBBCHMA to seek to ensure a consistent approach is applied

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1006	Landowners at Fradley and Alrewas (Wardell Armstrong)	23	<p>Promoting land around Alrewas and Fradley referred to as Brookhay.</p> <p>The Urban Capacity Study (Lichfield District Council, 2016) indicates that there is greatest capacity within key rural settlements for housing growth. However, growth at this level will not meet the scale of housing need related to Lichfield or unmet need from Birmingham. Importantly, apart from Fradley and Alrewas, the key rural settlements are located within the Green Belt. There is currently no evidence to suggest that removal of the sites identified within the Green Belt will comply with the principles of the NPPF in that a Strategic Green Belt Study does not appear to be proposed.</p> <p>The sustainability of development within key rural settlements is questionable and evidenced within the draft Sustainability Appraisal given the likely reliance on private modes of transport and strain on existing public services and facilities. Given the limited amount of additional housing delivery development within key rural settlements is likely to supply, combined within the constraints associated with Town Focused Development (as outlined above), the option would need to be combined with at least one and probably all the other development options in order to generate the amount of housing growth required.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO1007	Pegasus on behalf of Mr D Wright	4	<p>Agree that the policies listed in Table 1.2 will need to be significantly amended or replaced, as most of these policies are connected with implementing the spatial strategy for the District. If the Local Plan Allocations is adopted prior to the Local Plan Review then it is most likely that many the policies contained therein will also need to be significantly amended or replaced by the Local Plan Review.</p>	Comments noted.
SIO1008	Landowners at Fradley and Alrewas (Wardell Armstrong)	26	<p>Promoting land around Alrewas and Fradley referred to as Brookhay.</p> <p>Development predominantly within rural settlements is unlikely to fulfil the requirement of achieving sustainable development. It would also provide limited housing growth.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1009	Landowners at Fradley and Alrewas (Wardell Armstrong)	28	<p>Promoting land around Alrewas and Fradley referred to as Brookhay.</p> <p>Any new development under this option should be located in the most sustainable location.</p> <p>Land around Shenstone is located within the Green Belt. Paragraph 83 of the NPPF states that Green Belt boundaries should only be altered in exceptional circumstances. Given the availability of other sustainable options for development, it is clear that exceptional circumstances do not exist to alter the existing Green Belt boundary. The land around Shenstone is, on this basis, not a sustainable location for development.</p> <p>Paragraph 11.7 of the Local Plan Review states that the area of land to the north of Tamworth has, "limited constraints". However, this conclusion fails to recognise that the land is located in a Minerals Safeguarding Area under Policy 3 of the Minerals Local Plan for Staffordshire (2015 - 2030). Policy 3 specifically restricts non-minerals development within this area, unless specific criteria are met i.e. prior extraction. Thorpe Constantine does not have this status and development in this location would needlessly sterilise significant mineral deposits. A large proportion of the site is located within the River Mease water catchment area which is a Special Area of Conservation. By virtue of this European designation, there is a significant restraint to development of any scale unless exception mitigation can be implemented which will result in less than adverse effects, demonstrated by Appropriate Assessment. There is no evidence to suggest that a development of the scale of that outlined Thorpe Constantine.</p> <p>The aim is for Brookhay to become a visionary, yet deliverable settlement. The extensive preliminary work has provided a solid foundation for a progressive design process. The result is that Brookhay can be a high quality solution to strategic housing needs and economic growth ambitions. With a potential development scale of around 7,500 houses centred around a number of neighbourhoods set amongst over 220 hectares of green and open space and lakes linking to strategic features such as the National Memorial Arboretum (NMA), development is likely to have over a 20 year lifespan.</p> <p>The Brookhay site has been subject to extensive technical assessment which indicates that the site is deliverable within the current Local Plan period, overcoming the perceived constraints to development. The site is the only truly sustainable new settlement option outlined within the Lichfield District Council boundary and, as such, should be the only new settlement option taken forward by Lichfield District Council to the next stage of the Draft Plan. Further information can be found in attached vision document submitted.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1010	Pegasus on behalf of Mr D Wright	5	<p>Agree the policies in Table 1.3 require minor amendments. Core Policy 8 also needs to be updated in light of recent development for retail, leisure, office and cultural facilities which has occurred within the commercial centres of Burntwood and Lichfield City and in other settlements, and this may necessitate changes to the Hierarchy of Centres. Policy E1 includes thresholds for retail assessments and these will need to be amended in line with updated local retail evidence, once the spatial strategy for the Local Plan Review has been determined and the relevant floorspace requirements are known.</p>	Comments noted, policy CP 8 and E1 will be considered through the Review.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1011	Pegasus on behalf of Mr D Wright	6	Policy Lichfield 5: East of Lichfield (Streethay) requires updating in the light of the additional housing being proposed through the Allocations document. Policy Burntwood 5: East of Burntwood is considered to be out of date as the development is almost built out and Appendix F East of Burntwood Bypass SDA Concept Statement is therefore no longer required within the Local Plan Review document. Policy North of Tamworth may require amendment or removal. The review of this policy should be informed by the outcome of the Secretary of State's decision on the Arkall Farm planning appeal. Policy East of Rugeley identifies a location for a mixed-use development of approximately 1,130 dwellings, in line with the concept statement at Appendix G of the Local Plan: Strategy. However, it is noted that the SDA encompasses the Borrow Pit and under Policy R1: East of Rugeley Housing Land Allocations set out in the Local Plan Allocations Focused Changes document, the Borrow Pit is to be retained as landscape/water feature within the wider allocated housing site, and therefore will no longer deliver the 450 dwellings (approximately) within the plan period as previously anticipated. In light of this, it is considered that Policy East of Rugeley is now out-of-date and requires amending accordingly.	The Arkall Farm Inquiry resulted in outline permission being granted. The location of new growth will need to be considered during the Review
SIO1012	St Philips (GVA)	11	Issue of density is pertinent to addressing the housing needs of the HMA and require consideration beyond high-level analysis that has been presented within the SGS. To ensure development densities are appropriate, a non-standardised approach should be applied which allows density to be flexibly considered on a site-by-site basis. Sites which are sustainably located and less sensitive in environmental / visual impact terms may warrant higher- density development. It may be appropriate for density to be referenced in site- specific allocation policies. The inclusion of density within site-specific policies should be informed, where possible, by dialogue with developers and land promoters during the plan-making process.	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO1013	St Philips (GVA)	12	Council must be proactive and pragmatic in addressing cross-boundary issue of housing need. This will require meaningful engagement with HMA authorities, the objective must be to ascertain the total assessed housing need and move towards achieving a signed MoU to confirm the proportion of unmet housing need that will be accommodated in the District. Capacity should be informed by an up to date SHLAA. A starting point in seeking to accommodate an appropriate proportion of unmet need arising from Birmingham would be to consider commuter and internal migration flows within the District.	Comments noted. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield. The Local Plan Review will be informed by an extensive evidence base which will include an up to date SHLAA.
SIO1014	Pegasus on behalf of Mr D Wright	7	A trigger for a further review of the Local Plan should be incorporated to respond flexibly to changing circumstances. The Draft NPPF advises that policies should be reviewed to assess whether they need updating at least once every five years. In the interest of maintaining a continuous supply of housing to meet identified needs it is considered that reserve sites should be identified within the Local Plan Review. We firmly believe that consideration needs to be given to Safeguarded Land in order to meet longer-term development needs stretching well beyond the plan period.	A review trigger would only be necessary were there something specific that might trigger a review ahead of the NPPF 5 year review timetable
SIO1015	Pegasus on behalf of Mr D Wright	9	The vision and approach set out in the Local Plan remains relevant and is supported. The vision could be more ambitious as reference could be made to the opportunities within the wider West Midlands such as HS2 and the Commonwealth Games due to come to fruition within the plan period.	Comments noted sub-regional, regional and national initiatives will need to be assessed to identify whether there is scope to incorporate within the vision
SIO1016	Pegasus on behalf of Mr D Wright	10	The majority of the Strategic Priorities are considered to remain broadly relevant. Strategic Priority 6 'Meeting Housing Needs' refers only to meeting the needs of the residents of Lichfield District. It is considered that this should be amended to also refer to meeting the unmet housing needs of the wider Birmingham Housing Market Area.	The Review does include reference to the GBHMA shortfall. However it is recognised that the Plan Review will need to deal with cross boundary issues
SIO1017	Pegasus on behalf of Mr D Wright	11	As Lichfield District is very diverse in terms of housing density across the District it is considered that if density standards are incorporated within the Plan then these should be minimum standards determined by reference to the character of the local area and the housing mix as determined by local needs. In accordance with emerging national guidance the Council may wish to consider a variety of density standards for different locations.	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO1018	Pegasus on behalf of Mr D Wright	12	Lichfield District Council should assist in meeting the unmet housing needs of the HMA through identifying additional land for development in sustainable locations and in making best use of existing infrastructure in locations near to the conurbation.	Comments noted. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield.
SIO1019	Pegasus on behalf of Mr D Wright	13	Yes. The identification of specific sites, particularly smaller settlements such as Upper Longdon, for self-build and custom build development is favoured, as this option would have a greater chance of ensuring that the needs of local people wishing to build their own homes are met. It is recommended that these sites are specifically allocated as self-build/custom build sites. If the option of requiring certain developments to provide a proportion of their site as serviced plots is pursued, then this type of development should be secured through a legal undertaking to allow a mechanism for the developer or a third party to provide and facilitate plots.	Comments noted. This will be considered further as the Local Plan Review progresses and will be informed by a range of evidence.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1020	St Philips (GVA)	23	<p>Promotes land at Fradley Lane</p> <p>Whilst it is appropriate to plan for growth around the largest settlements, the extent to which this can be accommodated in a sustainable way must be considered.</p> <p>Without modification to allow for growth of some smaller Key Rural Village settlements, namely Fradley which is outside the designated Green Belt. Option 1 will be dependent on significant Green Belt release to accommodate urban extensions. Much of the Green Belt to the south of the District is expected to perform well against the five purposes.</p> <p>Option 1 unless modified will not deliver the most sustainable form of growth for the District. It would disregard the potential for key rural settlements to accommodate growth and be dependent on large-scale urban extension to deliver much needed housing, a substantial proportion of which will be required within the immediate five year period.</p> <p>Fradley Lane has the potential to achieve implementable planning permission in advance of the LPR being examined.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1021	Pegasus on behalf of Mr D Wright	14	<p>Yes. Other options used by LPA's include undertaking a strategic review of land within their ownership to identify smaller plots and proactively identify sites and establish if they are suitable for self and custom build. Planning briefs could be prepared for suitable sites to provide some certainty for prospective buyers. However, it is recognised that this approach is not always suitable, as many LPAs do not have large land-holdings and there are often issues of resourcing and financial liabilities to be resolved for such an approach to work.</p>	Comments noted. This will be considered further as the Local Plan Review progresses and will be informed by a range of evidence.
SIO1022	Pegasus on behalf of Mr D Wright	23	<p>We are broadly supportive of this option. It would allow a greater range of sustainable sites to come forward and would therefore increase housing choice for new and existing residents. We do however believe that there is scope to consider other rural settlements particularly where they are near larger settlements, including those outside the District e.g. Rugeley or Tamworth. Upper Longdon for example should be considered for additional growth, not only to main the sustainability of the settlement, but in recognition of its accessibility to the services and facilities at Rugeley.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1023	Pegasus on behalf of Mr D Wright	24	<p>The settlements are entirely suitable to remain as Key Rural Settlements, given that they all exhibit good levels of services and facilities, as well as accessibility to services in higher order settlements. However, it is noted that in reviewing the Local Plan there is an opportunity to update the Rural Settlement Sustainability Study which provided the evidence base for the categorisation of these settlements, to ascertain whether any changes are necessary and if there are any further settlements which should be added to this category.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1024	Pegasus on behalf of Mr D Wright	25	<p>This option would provide a very wide range of housing choice in a number of sustainable locations, and have the opportunity of providing dwellings in locations which accord with some of the recommendations in the Birmingham Strategic Growth Study. Distributing housing to these settlements would assist in maintaining their services and facilities. It is noted that the challenges highlighted for this option include reference to potential development sites being more likely to be greenfield and that changes to Green Belt boundaries may be required. It is considered that rather than a challenge the Local Plan Review affords the opportunity to re-examine settlement and Green Belt boundaries. Consideration should therefore be given to allocating sites beyond such boundaries and that these boundaries should be re-defined as necessary through the Local Plan Review process.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO1025	Landowners at Fradley and Alrewas (Wardell Armstrong)	38	<p>Yes.</p>	Comments noted
SIO1026	Pegasus on behalf of Mr D Wright	26	<p>The settlements listed with identified settlement boundaries represent the most sustainable settlements within the District. We believe that some growth should occur at the settlements listed at paragraph 10.3 to ensure that rural areas remain sustainable, but as discussed previously the focus for growth should be towards the most sustainable locations, particularly those with access to rail services to Birmingham. A comprehensive Green Belt Review is welcomed, this should extend to all other Green Belt settlements listed under Options 1 and 2.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO1027	Landowners at Fradley and Alrewas (Wardell Armstrong)	39	<p>Yes, should be prioritised to help deliver strategic development.</p>	Comments noted
SIO1028	Pegasus on behalf of Mr D Wright	27	<p>Although this option would have the advantage of meeting housing needs where they arise and support village services and facilities, in isolation it would represent the least sustainable option. Overall combining other options with growth at some of the more sustainable smaller settlements (listed at paragraph 10.3) may therefore be a more suitable spatial strategy.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1029	Landowners at Fradley and Alrewas (Wardell Armstrong)	40	<p>Agree that infrastructure should ne prioritised where it is a constraint to development.</p>	Comments noted

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1030	Pegasus on behalf of Mr D Wright	39	Neither the current NPPF, nor the Draft the NPPF advocates the approach of classifying infrastructure as critical/essential or important. It is not the role of the IDP to prioritise the delivery of infrastructure or what funds should be allocated to the delivery of that infrastructure, as these decisions will be informed by other processes, investment plans and strategies.	Whilst it is noted that prioritisation is not a requirements the District Council operates a CIL charge, prioritisation within the IDP will enable the informed distribution of funds and the development of a programme of needs across the plan period enabling a process that supports delivery of appropriate requirements which address evidenced need.
SIO1031	St Philips (GVA)	23	Promotes land at Fradley Lane Supportive of Residential Growth Option 2. Considers it to be the most appropriate strategy for meeting housing needs of the District and unmet needs of the HMA. Option 2 would ensure that housing needs can be met through a greater choice of locations in a more balanced way, so as to reduce dependency on high performance Green Belt release that may otherwise be required under Option 1. Option 2 is closely aligned with the spatial strategy set out in the adopted Local Plan. Welcomes recognition that elements identified through the Strategic Growth Study could be incorporated into this option, notably the area around Fradley. Council need to ensure that it can demonstrate a deliverable five year housing land supply, the ability of which will require a range of available and suitable sites to be identified in a variety of sustainable locations within the District. Option 2 would help achieve this	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1032	Landowners at Fradley and Alrewas (Wardell Armstrong)	41	Should be influenced by allocations within the Local Plan Review.	Comments noted
SIO1033	Landowners at Fradley and Alrewas (Wardell Armstrong)	42	IDP should take into account Brookhay URBED Vision document.	Comments noted
SIO1034	Landowners at Fradley and Alrewas (Wardell Armstrong)	43	Stakeholder engagement process should have regard to the recent Movement for Growth Strategy outlined by Transport for West Midlands which includes the strategic priorities of the area, including a planned strategy to serve Brookhay/ NMA near Alrewas.	Comments noted
SIO1035	RPS on behalf of the Fradley West Consortium	1	The Plan period is appropriate, as it is in line with the National Planning Policy Framework (NPPF) and Consultation NPPF, in terms of providing for a 15 year timeframe.	Comments noted
SIO1036	RPS on behalf of the Fradley West Consortium	2	The existing evidence base as set out in Appendix A of the plan should be reviewed and updated. Appendix D of the LPR is the first stage of the Infrastructure Development Plan (IDP) and it would be useful to reference this in Appendix A. A review of the Brownfield Land Register is welcomed. Any review of the BLR should ensure that it is consistent with other evidence base that has been/will be produced, specifically the Strategic Housing Land Availability Assessments (SHLAAs), which recognised the brownfield status of the site at Fradley Junction that is being promoted by the Fradley West Consortium. The evidence base should be updated in the context of the proposed changes to the NPPF and the NPPG, which includes reference to the housing delivery test and Green Belt Review.	The Brownfield Register will be kept up to date and will assist in informing the Plan Review
SIO1037	Burntwood Action Group	21	No Beyond the time frame of the Local Plan Allocations BAG believes that further housing development around Burntwood would destroy its very nature as a settlement surrounded by the Green Belt.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO1038	St Philips (GVA)	24	Promotes land at Fradley Lane Supports the continued identification of villages, notably Fradley, as key rural settlements within the Local Plan. This status is warranted on the basis of their sustainability and potential to accommodate an appropriate proportion of growth within the District in order to meet housing needs within the proposed plan period.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1039	RPS on behalf of the Fradley West Consortium	3	RPS agrees that meeting unmet housing needs arising from the Greater Birmingham Housing Market Area (HMA) is a cross boundary matter. The recently published Greater Birmingham HMA Strategic Growth Study also identified the potential for circa 22,000 dwellings of unmet need from the Black Country authorities. Lichfield District Council will need to engage with the other authorities to ensure that the housing need is addressed in full across the HMNA. A Statement of Common Ground, which clearly states how unmet needs will be met, will need to be signed by all of the Greater Birmingham HMA authorities. The quantum of unmet needs from each neighbouring authority and how these will be met should be clearly set out in the Local Plan Review. Whilst the standardised methodology for calculating the Objectively Assessed Housing Need gives a figure lower than the housing requirement in the adopted Local Plan Strategy, it is a minimum starting point. The housing need will need to be adjusted upwards accordingly.	Comments noted, LDC will continue to engage with the GBBCHMA to seek to ensure a consistent approach is applied
SIO1040	RPS on behalf of the Fradley West Consortium	4-7	Table 1.2, which refers to policies to be significantly amended or replaced references Policies Frad 1-4. It is considered appropriate that Fradley should continue to play a significant role in meeting housing needs, in light of its status as a Key Rural Settlement.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1041	St Philips (GVA)	26	Promotes land at Fradley Lane Distributing growth beyond the urban and key rural settlements is not considered to be the most sustainable option for meeting housing need. This option is less preferable than Option 2 which would achieve a more appropriate balance of development. If Option 3 proves favourable, Fradley should be identified to accommodate a higher proportion of growth than other settlements outside of Lichfield and Burntwood, given the absence of Green Belt constraints, relative proximity and accessibility to higher-order centres including Birmingham, and the growing employment facilities at Fradley Airfield.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1042	RPS on behalf of the Fradley West Consortium	8	Whilst RPS welcomes that an issue is to meet the strategic housing and employment requirements, this should be made more explicit, through reference to meeting growth associated with the Birmingham Housing Market Area.	The Review does include reference to the GBHMA shortfall.
SIO1043	Ralph Barnard	7	Scouting in Lichfield embraces people from all ages across the spectrum but particularly 5 to 18 years. Scouting is growing at a rate of 5% per annum, have waiting lists but can't find additional accommodation particularly in the areas that houses are being built, to start new additional Groups.	Comments noted, the IDP will need to cover community infrastructure
SIO1044	RPS on behalf of the Fradley West Consortium	9	Whilst the vision and approach set out in the Local Plan remains broadly relevant, it is important that the Vision includes a reference to meeting growth associated with the Greater Birmingham Housing Market Area.	The Review does include reference to the GBHMA shortfall.
SIO1045	St Philips (GVA)	28	Promotes land at Fradley Lane Supports the expansion of Fradley as a sustainable location for growth. The area is free from Green Belt constrain and is accessible to Lichfield, Burton and the wider A38 region. There is significant potential to improve local infrastructure to facilitate growth. Any new settlement should incorporate the existing village of Fradley so as to ensure development is effectively integrated in order to benefit from local shops and services.	Comments noted.
SIO1046	RPS on behalf of the Fradley West Consortium	10	Generally supportive of the Strategic Objectives, specifically the reference to Sustainable Communities, including key rural settlements, which includes Fradley. Whilst Objective 6 refers to meeting housing needs, this Objective should recognise the cross-boundary issues and reflect wider strategic priorities, including meeting any needs that cannot be met within the HMA. Objective 6 should either be further amended or there should be a new objective that should refer to the need to boost the supply of housing.	The Review does include reference to the GBHMA shortfall. However it is recognised that the Plan Review will need to deal with cross boundary issues
SIO1047	RPS on behalf of the Fradley West Consortium	11	Any policy should not be unduly prescriptive and a character led approach should be adopted as in some instances there may be clear reasons why a minimum density could not be met for certain geographical locations. This would also help to ensure that developments are potentially more able to reflect any housing mix.	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO1048	RPS on behalf of the Fradley West Consortium	12	With regard to how Lichfield District Council should assist in meeting unmet needs arising from within the Greater Birmingham HMA, please see answer to Question 3.	Comments noted.
SIO1050	RPS on behalf of the Fradley West Consortium	18	There may potentially be a need to consider progressing supporting Development Plan Documents for Lichfield City Centre and Burntwood Town Centre, but the priority should be to ensure an up-to-date Local Plan Review.	Comments noted. The Council is committed to preparing the Local Plan Review and the most appropriate supporting documents and evidence base will be considered as the review progresses.
SIO1051	Ralph Barnard	20	Other development required is the provision of buildings for community and youth activities, the management and running of these premises, if let to scout Groups etc. can usually be undertaken by the youth charities themselves, though the building costs may cause a problem initially.	Comments noted
SIO1052	Ralph Barnard	27	Where the size of an area with new housing was significant then youth facilities should be considered as a matter of course.	Comment noted.
SIO1053	RPS on behalf of the Fradley West Consortium	Whole Document	RPS supports the reference in paragraph 7.8 that the District Council considers it would be appropriate to consider all options identified within the Greater Birmingham Strategic Growth Study at this stage of the Local Plan Review. Promotion of Fradley Junction for a scheme of circa 250 dwellings, an innovation campus and a local centre. The Local Plan Review in considering options for residential growth recognises that there may be a need to consider sites for growth beyond the existing boundaries of villages. Fradley Junction would therefore be consistent with the potential options identified in the LPR Scope, Issues and Options document. From the current evidence base that has been prepared, there are no technical or environmental issues that would preclude the development upon the site. Site Constraints and Opportunities. Paragraph 136 of the Consultation NPPF makes it clear that all reasonable options must be examined fully before considering altering Green Belt boundaries. This will include taking into account whether the strategy makes as much use as possible of suitable brownfield sites. The land at Fradley Junction is a brownfield site outside the green belt. The development will deliver significant social, economic and environmental benefits; is consistent with the existing and emerging Plan Strategies and would help to meet housing need in a sustainable location.	Within Cannock Chase SAC 15km buffer zone. Conservation Area. Listed Building and Canal Monument.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1054	RPS on behalf of the Fradley West Consortium	21, 22	Option 1 is not considered to be the most appropriate option in its own right, as the Council has identified various challenges including that potentially insufficient land is available outside of the green belt.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1055	Ralph Barnard	43	Would hope that stakeholder engagement process would result in the identification of infrastructure requirements specifically and particularly enable the delivery of those requirements in the need for youth development provision.	Comments noted
SIO1056	RPS on behalf of the Fradley West Consortium	23	Growth Option 2 is an appropriate option for growth and supports the acknowledgement that there may also be a need to consider sites for growth beyond the existing village settlement boundaries. RPS also welcomes the acknowledgement that the only identified Key Rural Settlements that are entirely outside the Green Belt are Fradley and Alrewas. Land at Fradley Junction, as promoted by the Fradley West Consortium for circa 250 homes could readily deliver much needed housing growth on acknowledged brownfield land for the area including affordable housing together with a range of community facilities. A Vision Document for Fradley Junction has been provided.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1057	Birmingham City Council	Whole Document	<p>Duty to Cooperate Supportive of the approach set out in Para 7.8 of exploring all options identified within the Strategic Growth Study. Welcome the strong reference to the Strategic Growth Locations Study and considering the result of study. Supportive that the document acknowledges that Government's new standard housing needs method produces a figure that is somewhat below the objectively assessed need identified in Lichfield's current local plan, but concede that this may need to be elevated to help meet HMA shortfall.</p> <p>Scope, Issues and Options Suggested addition to Strategic Objective 6 'To ensure that provision is made for an appropriate proportion of the HMA shortfall to be accommodated in Lichfield, consistent with achieving sustainable development and the other objectives of the Plan'.</p> <p>Densities The Strategic Growth Locations Study estimates that approximately 13,000 additional units could be delivered if higher densities were applied to sites without planning consent (40 dwellings per hectare (dph) Birmingham / Black Country, 35 dph elsewhere). These increases are not distributed evenly across the HMA but focus on certain local authorities. Majority of the increases are from applying minimum density thresholds are seen historically in lower density areas such as Lichfield where new build is weighted towards detached housing. Supports the SGS conclusions that this does not mean that these areas cannot strive to achieve higher densities'. A minimum density of 30 – 40 dph could be achieved through appropriate design and the need for different types and sizes of homes.</p>	Comments noted, especially SO6.
SIO1058	RPS on behalf of the Fradley West Consortium	24	RPS agrees with the identification of Fradley as a Key Rural Settlement but also considers that a distinction should be made between Key Rural Settlements that lie within Green Belt and those Key Rural Settlements that lie outside of the Green Belt. This would be consistent with the Consultation Draft NPPF, which strengthens the protection to Green Belt and refers to firstly considering land which has been previously-developed before considering Green Belt release.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1059	Landowners at Brooklyn Farm, South of Highfields Road and Redrow (First City)	1	<p>Promotes land south of Highfields Road</p> <p>Considers the plan period 2020 - 2036 appropriate as it falls in line with NPPF guidance.</p>	Comments noted
SIO1060	RPS on behalf of the Fradley West Consortium	26	Whilst Option 3 would distribute growth according to the level of services and facilities, paragraph 10.1 recognises that this would require relatively high levels of growth to occur at each settlement. As per the response to Question 23 and Question 24, Fradley lies outside the Green Belt and is ranked as a third tier settlement according to the settlement hierarchy and is more able to take more development compared to other Key Rural Centres.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1061	RPS on behalf of the Fradley West Consortium	28	Option 4 derives from the Strategic Growth Study. RPS supports the Council's approach in paragraph 11.6 of the LPR, which states that the option of 'Land around Fradley and Alrewas' should be considered for a new settlement.	Comments noted.
SIO1062	RPS on behalf of the Fradley West Consortium	31 and 33	Agreed that employment development should be focused on the existing employment areas as per Employment Growth Option 1, which includes Fradley Park, focused primarily on the former site of RAF Lichfield. The opportunities should also reflect that in the case of Fradley Park, that there is residential development nearby, which provides the opportunity for sustainable forms of transport and could reduce additional commuting	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1063	Landowners at Brooklyn Farm, South of Highfields Road and Redrow (First City)	2	<p>Promotes land south of Highfields Road</p> <p>Considers there is a need for housing related evidence base to be updated and a requirement for a fresh Green Belt review to be produced.</p> <p>Consider it is important for the Council to be realistic and accept that there will be requirement for the release of Green Belt land and the community should be advised of this from the outset. It is not beneficial to deny the inevitable and there will be a requirement for Green Belt release to take account of the needs of Lichfield District and the wider HMA. The most sustainable locations for green belt release are Lichfield and Burntwood.</p>	<p>Consideration to undertaking a HEDNA will be undertaken</p> <p>Comments noted, consideration of a Green Belt Review will be undertaken</p>
SIO1064	Alrewas Parish Council	2	<p>Following Level 2 SFRA pleased to see at P74 Site A2 requires consideration and implementation of measures to manage potential impacts of flooding. The final two words 'is necessary' are missing from the statement of Key Development considerations. This also occurs in the LPA Exception Test document at P.9.16.</p> <p>Local knowledge confirms that housing in Dark Lane and vicinity is already affected by flooding when there is prolonged or severe rainfall and the Parish Council requests the strongest possible protections are put in place and that purchasers are fully informed of the potential problems.</p>	Comments noted.
SIO1065	Harborough District Council	Whole Document	Harborough District Council does not wish to make specific comments at this time.	Comments noted.
SIO1066	Landowners at Brooklyn Farm, South of Highfields Road and Redrow (First City)	3	<p>Promotes land at south of Highfields Road</p> <p>Consider the main strategic areas of planning included in Para 1.25 - 1.34 will have a direct cross boundary impact. Consider all areas of focus should be assessed and where necessary should be updated with fresh relevant evidence.</p> <p>Consider it important to acknowledge para 1.30 which identified GBSGS incorporated a strategic Green Belt review and it is anticipated further local Green Belt review will be required.</p> <p>Arguably a need to a two tiered approach to Green Belt including strategic level and more locally focused version looking at individual parcels of land.</p>	Comments noted, in relation to the Green Belt evidence LDC will give consideration to the appropriate methodology
SIO1067	Burntwood Action Group	2	<p>Transport Studies - need to commission a traffic flow study along the A5190 east and west of Burntwood and analyse bus services serving Burntwood.</p> <p>Employment Land Review - detailed analysis of the use of all the land at Mount Road should be undertaken and assessed for future viability.</p> <p>Historic Environment Landscape Character Assessment - The land bordered by Coulter Lane, Nether Lane, Rugeley Road and Church Road, Burntwood is one of the few remaining parcels of land which help to retain the character of Burntwood Village as a historic, rural settlement. A desk based assessment is worthless.</p> <p>Ecological Assessment - the latest information from Staffordshire Ecological Survey for each parcel of greenfield / green belt assessed should be used.</p> <p>Biodiversity & Development SPD - Para 6.57 point 3 is virtually impossible to achieve and should be replaced with 'and be able to demonstrate that the proposed development will result in zero loss of biodiversity.' New paragraph at 6.58 should be added 'If it is evident that a proposed development will result in a loss of biodiversity it will not be granted planning permission unless the applicant can provide evidence to prove that there is an exceptional need (which considerably outweighs the loss of biodiversity) for the proposed development taking place on that particular site.'</p> <p>Open Space SPD - in rewriting this SPD LDC should consult residents on the identification of such spaces, which they value for such purposes.</p> <p>Green Belt Review - There are elements of criteria of the 2013 Supplement and subsequent reviews that do not feature in Green Belt reviews of neighbouring authorities or the GBHMAGS. Questions the definition of Large Built up Areas and submits assessment of parcel of land Burntwood E1. There is need for public scrutiny of all Green Belt reviews. When formulating assessment criteria for the new Green Belt Review, BAG urges LDC to take account of the above criticisms of previous reviews and formulate new assessment criteria which are consistent with those used by other authorities and do not prejudice the assessment of particular parcels of land.</p>	<p>Transport evidence will be required to inform the Local Plan Review</p> <p>Consideration of employment land and economic evidence will be undertaken</p> <p>Comments noted, consideration of a Green Belt Review will be undertaken</p>

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1068	Landowners at Brooklyn Farm, South of Highfields Road and Redrow (First City)	4	Promotes land south of Highfields Road Considers all of the policies should be reviewed and if necessary amended or replaced. Important for the Council to define whether they are undertaking a review of the plan or starting a fresh plan. Consider the core policies relating to directions of growth still apply and should not result in a diversion from the strategy which states Lichfield and Burntwood are the most sustainable settlements.	Comments noted.
SIO1069	Burntwood Action Group	18	Agrees that AAP and SPD should be produced for Burntwood Town Centre. Suggests LDC commissions an overview of a new town centre. This will need to take account of building present and planned and ambitious in detailing how they can be modified. Should include health centre, parking, footpath and cycle ways, pedestrian areas, integrated accommodation, re-route of Cannock / Bridge Cross Road.	Comments noted.
SIO1070	Landowners at Brooklyn Farm, South of Highfields Road and Redrow (First City)	5	Consider policies set out in Table 1.3 may only require minor amendments. As the review process continues and potentially additional information is added to the evidence base then this can be answered fully.	Comments noted.
SIO1071	Burntwood Action Group	10	Agrees with strategic priorities but must point out that the Spatial Strategy is not consistent with Priorities 11: Healthy & Safe Lifestyles, 12: Countryside Character and 13: Natural Resources. Focussing the majority of new homes in or around the Key Urban Centres of Burntwood and Lichfield may be sustainable for Lichfield due to its excellent road and rail links and good facilities but it is not sustainable for Burntwood. Burntwood has no rail link, only minor roads northwards, one congested road running east – west and the Bypass, which has done little to ease traffic flow in the centre or east of Burntwood. Any expansion of Burntwood into the surrounding Green Belt will violate all the Strategic Priorities stated above. This leads BAG to support a new Spatial Strategy which focuses housing development on new settlements.	Consultation feedback from Burntwood indicates that there is a lack of infrastructure. In order developer contributions to support the provision of infrastructure there will be a need to incorporate development within Burntwood.
SIO1072	Landowners at Brooklyn Farm, South of Highfields Road and Redrow (First City)	8	Promotes land south of Highfields Road Consider main issues have been identified which affect the District. It is understandable the main areas of focus are housing and employment. The Council have continuously granted planning permissions significantly in excess of the annual housing requirement to ensure a rolling 5 year housing land supply however there has been a significant shortfall in delivery against requirements. Delivery of housing should be the main goal when allocating large sites. Large strategic allocations do not bring forward completion delivery as fast as sites up to 500 dwellings. Confirms Redrow are working with First City to promote land south of Burntwood for residential development.	Agreed that delivery is an issue despite the Council granting permissions in excess of the housing requirement. There is an onus on the development industry to build out their permitted sites.
SIO1073	Landowners at Brooklyn Farm, South of Highfields Road and Redrow (First City)	9	Promotes land south of Highfields Road Agree with current vision and approach regarding key settlements such as Lichfield and Burntwood being the main focus for development. Due to a significant proportion of the District being Green Belt consider it prudent for the Council to acknowledge the need for Green Belt release of land from the outset and allocate sites within sustainable settlements including Lichfield and Burntwood. This will allow development patterns to be established and prevent ad hoc development appearing in areas not consistent with the adopted Local Plan from coming into fruition. Understand there some be some flexibility to allow the plan to be appropriate for national significant change however consider the Council should be mindful of the pattern and direction of growth that has taken place during the current plan period and take this into consideration as part of the Local Plan Review.	A Green Belt Review will be undertaken which will influence any development within the current Green Belt
SIO1074	Landowners at Brooklyn Farm, South of Highfields Road and Redrow (First City)	10	Promotes land south of Highfields Road Agree with general strategic priorities. Consider there should be more emphasis on sustainable existing urban settlement of Lichfield and Burntwood within Objective 1. Consider it important for the profile of Burntwood to be increased and improved and be identified as having slightly different but not inferior qualities to Lichfield. This can be done by increasing investment in Burntwood via new residential, employment and retail development.	Comments noted, an assessment of where growth will take occur needs to be undertaken

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1075	Landowners at Brooklyn Farm, South of Highfields Road and Redrow (First City)	11	<p>Promotes land south of Highfields Road</p> <p>Do not consider the Local Plan Review should include a density policy. There may be sites and proposals where an increase in density is appropriate of 35 dph but that should be taken on a case by case basis. A density policy would be better suited to an SPD which can be applied more flexibly and updated more rapidly. A blanket density figure could result in inappropriate developments.</p>	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO1076	Landowners at Brooklyn Farm, South of Highfields Road and Redrow (First City)	12	<p>Promotes land south of Highfields Road</p> <p>Pleased the Council acknowledge the need for the District to accommodate some of the unmet shortfall in housing arising within the HMA.</p> <p>Appreciate the Council has a 5 year supply via permissions but acknowledge this had not led to a sufficient number of completions. This is a serious failing. The GBHMA SGC identifies a minimum provision of 208,000 dwellings to 2031, with 258,500 homes to 2023 across the HMA. There is an outstanding minimum shortfall of 28,150 dwellings to 2031 and 60,900 dwellings to 2036. Certain authorities unable to meet their current needs, consequently it will be incumbent on Districts such as Lichfield to accommodate a sensible proportion of the shortfall.</p> <p>Due to a large proportion of the District being located within the Green Belt and most of the sustainable settlements are in effect inset in the Green belt it is important to acknowledge there will be a requirement for the release of land from the Green Belt for residential development. Land on the edge of sustainable settlements of Lichfield and Burntwood should be reviewed and released in the first instance.</p>	Comments noted. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield. The Local Plan Review will be informed by a range of evidence including a Green Belt Review.
SIO1077	Turley on behalf of Legal & General UK Property Fund	4	<p>It is clear from L&Gs activity to date that they are committed to enhancing Fradley Park to ensure it continues to deliver significant employment benefits for Lichfield District and the wider region. The Council should therefore seek to review Core Policy 1 and 7, and Policy Frad3 of the adopted LPS (having regard to this market and commercial evidence) to ensure that Fradley remains a focus for employment growth within the District. The policies of the Local Plan Review should allow sufficient flexibility in respect of the form and quantum of development for business space and complementary uses, allowing Fradley to continue performing effectively and retaining its major focus for employment within the District.</p>	The focus for employment growth will be considered through the Review process
SIO1078	Landowners at Brooklyn Farm, South of Highfields Road and Redrow (First City)	13	<p>Promotes land south of Highfields Road</p> <p>The updated NPPF requires Councils to identify a number of small sites, these would be most appropriate for self-build and custom housing as small sites are more straightforward to deliver. Consider it would be counterproductive to require a proportion of certain developments to be self-build and custom housing as this will not help to speed up housing delivery and could impact on viability and delivery of the wider site.</p>	Comments noted. This will be considered further as the Local Plan Review progresses and will be informed by a range of evidence.
SIO1079	Landowners at Brooklyn Farm, South of Highfields Road and Redrow (First City)	21	<p>Promotes land south of Highfields Road</p> <p>Consider focusing development around the existing main urban is an appropriate option for growth. This would see the majority of growth focused on major settlements within and adjacent the District. Consider there is insufficient land within the existing settlement boundaries of Lichfield Burntwood to provide sufficient housing as part of the LPR. The UCA identified there was a finite supply of capacity within the existing urban area therefore sites would need to be considered beyond existing urban areas.</p> <p>Agree the need for urban extensions and consider this will have to be identified within Green Belt land as a result of the position of Lichfield and Burntwood. Support the largest two settlements receiving the largest allocations for future development.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO1080	Turley on behalf of Legal & General UK Property Fund	Whole Document	<p>Promotion of 83.06 hectares of land at Fradley Park Industrial Estate ('Fradley Park'). Since taking control of the site in December 2014 L&G is seeking opportunities to improve the asset.</p>	Comments noted.
SIO1081	Turley on behalf of Legal & General UK Property Fund	8	<p>It is welcomed that the Council wish to facilitate a wider range of employment within the District. We recommend that focussing employment development to existing locations, such as Fradley Park, should be a key issue listed in the emerging Local Plan Review. These issues should also be reflected in the District's strategic objectives.</p>	It is not necessary for the objectives to state at this stage where employment growth will be directed. This should be informed by the Plans ongoing evidence base.
SIO1082	Landowners at Brooklyn Farm, South of Highfields Road and Redrow (First City)	22	<p>Promotes land south of Highfields Lane</p> <p>Consider the main opportunities and challenges have been identified. However consider it important in connection to the challenges to acknowledge that regardless of where development takes place there may need to be requirement for services to be improved / extended. These challenges are more easily met on extensions to the existing main settlements rather than in scattered locations around the District. Strongly supports Growth Option 1/</p>	Comments noted.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1083	Turley on behalf of Legal & General UK Property Fund	10	It is critical to the future of Fradley Park and the associated employment benefits that Strategic Objective 4 relates to infrastructure needs for the whole District, including improvements to the Hilliard's Cross Junction at the A38, not just regeneration initiatives. This would be in accordance with the emerging Lichfield Local Plan: Allocations document which states planning protection will be given to land for road and junction improvements at the A38 Hilliards Cross (emerging Policy ST5 'Road and Junction improvements – Fradley').	Comments noted, an assessment of where growth will take occur needs to be undertaken, where this creates strategic infrastructure needs this will need to be reflected in the Plan, specifically in the IDP
SIO1084	Turley on behalf of Legal & General UK Property Fund	20 & 39	The IDP recognises the improvements to the strategic highway network required to support the District, including the capacity concerns along the A38 at Fradley. Wording should be added to the emerging Local Plan Review and the updated IDP that commits both Staffordshire County Council and Highways England to exploring a single solution for future proofing the Hilliard's Cross junction on the A38 at Fradley Park. This will ensure that the junction is improved on a comprehensive basis and will provide sufficient capacity to accommodate further employment development at Fradley Park.	Comments noted, an assessment of where growth will take occur needs to be undertaken, where this creates strategic infrastructure needs this will need to be reflected in the Plan, specifically in the IDP
SIO1085	Landowners at Brooklyn Farm, South of Highfields Road and Redrow (First City)	23	Growth Option 1 would be the preferred option, also support Growth Option 2 because development would be focused in the main urban areas. This represents a continuation of the existing spatial strategy which has not been as successful as originally envisaged and has resulted in a significantly greater percentage of housing in rural areas. Consider the Council should try to address the balance so more development should be focused on larger or urban areas.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1086	Turley on behalf of Legal & General UK Property Fund	31-38	The most sustainable option will be to focus employment development to the existing employment areas, including Fradley. Fradley Park has proven to be a highly successful strategic employment site of regional importance since it was first developed. It represents Lichfield District's premier employment site and remains as a competitive option within the District and across the wider region. The Local Plan: Allocations document has sought to extend Fradley Park, which is supported by L&G as it continually seeks opportunities to improve the Estate as a whole. The Local Plan Review should continue to focus employment development to Fradley, with flexible principles in the policies in relation to development form, scale and access.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1087	West Midlands HARP Planning Consortium (Tetlow King)	2	Promising to see that the Strategic Housing Market Assessment and Affordable Housing Viability assessment are each to be reviewed (as set out at Appendix A of this consultation document) as each are now rather dated, last published in 2012. These should each review the tenures of affordable housing set out in the new NPPF (expected to be published in July 2018) as these will differ from the previous SHMA. This is necessary to ensure that any updates to the affordable housing policies are deliverable in line with the tests of 'soundness'; each should be updated once the Council has progressed the detail of its new policies further.	Consideration to undertaking a HEDNA will be undertaken Comments noted viability evidence will be considered
SIO1088	West Midlands HARP Planning Consortium (Tetlow King)	4	Agree that Policy H2 needs to be updated. This needs to take account not only of more recent evidence of housing needs, but also the updates to the affordable housing definition set out in the new NPPF. This retains social and affordable rented but expands the definitions of other types of housing considered by the Government to fall within the affordable category. The review of this policy will also need to take into account how well the dynamic model of viability has operated since the Plan's adoption, and whether a more static policy would assist in delivering a greater overall level and number of affordable homes in Lichfield.	Comments noted.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1089	Environment Agency	Whole Document	<p>We welcome Sections 2.37 and 2.38 and constraints map 2.3, which provides an overview of flood risk issues as well as nature conservation in particular reference to the River Mease Special Area of Conservation. We consider that flood risk is a key local issue as well as a cross-boundary issue and as such should be addressed by the inclusion of a specific flood risk policy to cover all types of flooding. There are currently around 1,000 residential and 700 non-residential properties at risk of flooding from rivers in the Lichfield area with many more at risk from surface water flooding. The risk is likely to increase as a result of climate change.</p> <p>The Local Plan review will need to be based on up to date and robust evidence, this includes Strategic Flood Risk Assessment. Although the SFRA was revised in 2014, it does not take account of the latest climate change allowances.</p> <p>We consider there should be a standalone Flood Risk Policy within the new Local Plan. Suggested policy wording is provided.</p> <p>We consider policies 1-6 will need to be amended as some of the key rural settlements identified for growth have flood risk issues which must be taken into account when considering locations for new development.</p> <p>There should be some amendments to Policy 13 – Our Natural Resources to include the importance of river corridors and other green spaces with making space for water, for reducing flood risk, adapting/mitigating climate change and providing an important habitat/migration corridor for species of extra importance in the light of climate change</p> <p>We recommend that Policy NR1 Countryside Management also includes support for proposals for natural flood management. Policy NR3 Biodiversity, Protected Species & their Habitats should include the multiple benefits provided by implementation of natural flood management measures and the importance of watercourses as a valuable habitat.</p> <p>Trees and woodlands can also play a role in managing and reducing flood risk. Encourage and support woodland creation for managing flood risk therefore policy NR4 Trees, Woodlands & Hedgerows and Policy NR6 Linked Habitat Corridors & Multi-functional Greenspaces should reflect this as watercourses are one of the most important habitat corridors and their continuity needs to be protected which has implications for river crossing i.e. sensitive bridge design.</p> <p>Strategic Objectives 3. And 13. Should have reference to flood risk.</p>	Consider New Evidence- SFRA; Policies 1-6. Consider New Policies 13; NR1- natural flood management, alongside NR3; Policies NR4 and NR6- watercourses.
SIO1090	West Midlands HARP Planning Consortium (Tetlow King)	7	<p>There is no separate policy on older people's housing despite the LPR recognising the challenge of the ageing population at paragraph 2.6. A separate policy is needed to fully represent the needs of housings and are for older people.</p> <p>An example of positive policy wording is: "The Council will, through the identification of sites and/or granting of planning consents, provide for the development of residential care homes, nursing homes, close care, extra care and assisted care housing, and Continuing Care Retirement Communities which encompass an integrated range of such provision. In identifying sites and/or determining planning applications, regard will be had to:</p> <ul style="list-style-type: none"> • Commission for Social Care Inspection and other operational requirements; • Locational sustainability. Suitable sites at defined settlements will be prioritised, but where such sites are not available, regard will be had to the availability of public transport and the potential for developments to be self-contained, thereby reducing travel requirements; • The potential to co-locate a nursing/residential care home and other care related accommodation on the site where there are demonstrated needs." 	The Council will give these matters consideration as part of the review, in particular focusing on the requirements arising from the NPPF and NPPG.
SIO1091	West Midlands HARP Planning Consortium (Tetlow King)	9	It is recommended that the word 'affordable' is included in the Vision on page 25 as this is an important strategic priority for the Council.	Comments noted - this will be assessed further
SIO1092	West Midlands HARP Planning Consortium (Tetlow King)	13	Should the Council introduce a policy approach towards self- and custom-build housing, any requirement should not be in place of traditional affordable housing requirements. Self- and custombuild have complex requirements for funding and as such is out of the reach of most households who seek affordable housing, nor is this included within the NPPF affordable housing definition. Any policy requirement should be fully viability tested when assessed alongside all other policy requirements to ensure that any requirement will not result in affordable housing being reduced on viability grounds.	Comments noted. This will be considered further as the Local Plan Review progresses and will be informed by a range of evidence.
SIO1093	West Midlands HARP Planning Consortium (Tetlow King)	Whole Document	The Greater Birmingham Housing Market Area Strategic Growth Study evidenced a significant increase in need for all housing tenures, of all sizes. In translating these needs into suitable policies the Council should look to involve Housing Associations as far as possible in setting a local definition of affordable housing that will encourage delivery of all affordable housing types. As the presumption should always be in favour of on-site affordable housing delivery, the preference for early engagement with local Housing Associations should be emphasised in the Plan policies.	Consider New Policy- Housing Associations.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1094	Landowners at Brooklyn Farm, South of Highfields Road and Redrow (First City)	24	<p>Land at south of Highfields Road</p> <p>It would appear that limited circumstances have changes to warrant a change in the classification of the aforementioned settlements as key rural settlements.</p> <p>Note that although identified as key rural settlement in the adopted local plan there has been a significant number of applications granted in key rural settlements and other rural areas which has exceeded the proposed level of growth set out in the plan. It is important that robust policies are put in place to prevent development in places which are not equipped for significant development growth. There is a need to prevent too much unplanned development which is not consistent with adopted policy. Consider large scale development should be directed towards the larger more sustainable settlements of Lichfield and Burntwood.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO1095	Inland Waterways	5	<p>Reference to the provision of essential canal infrastructure by developments adjacent to the Lichfield Canal was agreed in 2014 as a Main Modification to Strategy Plan Policy Lichfield 6: South of Lichfield, but was subsequently omitted due to clerical error by the Council. Table 1.3 and Appendix B of this Review proposes some amendment to Policy Lichfield 6 and this should include reinstatement of the agreed but omitted wording.</p> <p>After the first sentence of Policy IP2: Lichfield Canal add: "Development on or adjacent to the route should provide any infrastructure necessary to maintain the integrity of the route." The policy should include reference to essential canal infrastructure provision.</p> <p>Although the details are covered in the Infrastructure Delivery Plan for the 3 South Lichfield SDAs this does not carry the same weight as a policy, and also does not cover the remainder of the route where other developments may conceivably be proposed within the lifetime of the Plan. The provision of essential new infrastructure, e.g. access bridges over the canal route, should be referenced in the policy to make it clear to developers that the canal route safeguarding needs not only passive provision but may require physical infrastructure.</p>	The Lichfield & Hatherton Canal will need to be given consideration in the Local Plan Review. However the canal policy is also being considered through the Local Plan Allocations EIP.
SIO1096	Landowners at Brooklyn Farm, South of Highfields Road and Redrow (First City)	26	<p>Land south of Highfields Road</p> <p>None. Consider significant residential development should be directed to Lichfield and Burntwood as they have greater services, facilities and infrastructure to accommodate and support future growth with limited development located in other smaller settlements in line with the established settlement hierarchy.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1097	Inland Waterways	Whole Document	<p>Map 2.2 Infrastructure links and Map 2.3. - The route of the Lichfield Canal is incorrectly shown on both these maps.</p> <p>Several wording changes are proposed to paragraphs, 2.17, 2.30, 2.31, 2.34</p>	Consideration relating to evidence base- Lichfield Canal (relocate to Q2).
SIO1098	Landowners at Brooklyn Farm, South of Highfields Road and Redrow (First City)	28	<p>Land south of Highfields Road</p> <p>Do not support Growth Option 3 which would result in growth focused on one or more new sustainable settlement(s) located within the District. This would significantly alter the character of the District and prevent established key sustainable settlements of Lichfield and Burntwood from being the main focusses for the District.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1099	Landowners at Brooklyn Farm, South of Highfields Road and Redrow (First City)	29	<p>Land south of Highfields Road</p> <p>Development land should be sought on the edge of existing sustainable settlement of Lichfield and Burntwood prior to significant large settlements being created from scratch. Once land has been identified around Burntwood and Lichfield then the creation of new settlements should be investigated as a potential second phase to meet housing needs of the District and the wider HMA.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1100	Lichfield & Hatherton Canals Restoration Trust Ltd	5	<p>Reference to the provision of essential canal infrastructure by developments adjacent to the Lichfield Canal was agreed in 2014 as a Main Modification to Strategy Plan Policy Lichfield 6: South of Lichfield, but was subsequently omitted due to clerical error by the Council. Table 1.3 and Appendix B of this Review proposes some amendment to Policy Lichfield 6 and this should include reinstatement of the agreed but omitted wording.</p> <p>After the first sentence of Policy IP2: Lichfield Canal add: "Development on or adjacent to the route should provide any infrastructure necessary to maintain the integrity of the route." Since 2015, we and Mr Sharpe of the Inland Waterways Association have raised our concerns on several occasions and we feel that those representations have yet to be properly addressed. We note, in particular, that the present document under review fails to put a clear obligation on developers of land alongside the canal route to make necessary provision, at their own expense, for the canal.</p> <p>Although the details are covered in the Infrastructure Delivery Plan for the 3 South Lichfield SDAs this does not carry the same weight as a policy, and also does not cover the remainder of the route where other developments may conceivably be proposed within the lifetime of the Plan. The provision of essential new infrastructure, e.g. access bridges over the canal route, should be referenced in the policy to make it clear to developers that the canal route safeguarding needs not only passive provision but may require physical infrastructure.</p>	The Lichfield & Hatherton Canal will need to be given consideration in the Local Plan Review. However the canal policy is also being considered through the Local Plan Allocations EIP.
SIO1101	Landowners at Brooklyn Farm, South of Highfields Road and Redrow (First City)	31	<p>Land south of Highfields Road</p> <p>Yes, employment development should be focused on the largest settlements that have the largest populations within the District. This will enable larger settlements to fulfil their role of being sustainable. Support Employment Growth Option 1.</p>	Comments noted.
SIO1102	Lichfield & Hatherton Canals Restoration Trust Ltd	Whole Document	<p>Map 2.2 Infrastructure links and Map 2.3. - The route of the Lichfield Canal is incorrectly shown on both these maps.</p> <p>Several wording changes are proposed to paragraphs, 2.17, 2.30, 2.34</p>	Consideration relating to evidence base- Lichfield Canal (relocate to Q2).
SIO1103	Anwyl Land Ltd (Marc Hourigan)	1	<p>Promoting site at land north of Rake Hill, Burntwood.</p> <p>Plan period is acceptable subject to it being able to be adopted in time to ensure at least a 15 year time horizon from the point of adoption.</p>	Comments noted.
SIO1104	Anwyl Land Ltd (Marc Hourigan)	2	<p>At Examination of the Local Plan Strategy (LPS) the need for further work in relation to the Green Belt was highlighted, resulting in the Green Belt Supplementary Report 2013, in which individual parcels were assessed. Within the 2013 report, although Lichfield City, Burntwood and the key rural settlements were recognised as a focus for development, it was further identified that Green Belt release around Burntwood specifically should have regard for outward sprawl and the need for regeneration of the town as a priority.</p> <p>Proposed site falls within the parcel identified as Burntwood North 4 (N4). Parcel Burntwood N4 is assessed by the Council as having a minor role in all but two categories. Disputes the reference to the closing of the gap between Burntwood and Gentshaw which could have any material harm given existing urban form and the potential for the establishment of a new settlement edge. Also disputes the value to which the land has for the setting of the AONB and SSSI as set out in the Site Assessment Form for Parcel N4 Burntwood.</p> <p>All matters are discussed in more detail in Vision document and technical appendix which will be submitted to the Council subject to the sites removal from the Green Belt and allocation for housing, there is a need for the Council's existing Green Belt Review to be revisited as Burntwood N4 performs more poorly in Green Belt terms than has been assessed.</p>	Comments noted, consideration of a Green Belt Review will be undertaken
SIO1105	Mel Evason	Whole Document	<p>Promoting approximately 1 acre of land at Sydercote Lane for circa 10 bungalows. The site is well located close to amenities including the primary school.</p> <p>Confirms the paddock has previously been granted permission for residential use.</p>	Comments noted.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1106	Anwyl Land Ltd (Marc Hourigan)	4	<p>Agree that Policies Burntwood 1-4 will need to be significantly amended or replaced. Concerned that Burntwood has not met the aspirations set for it in the LPS. Scale of development planned to be delivered over the remainder of the LPS plan period is now significantly less than Table 8.1 of the LPS anticipated.</p> <p>LPA Focused Changes document demonstrates that the total expected number of new dwellings to be delivered in Burntwood over the plan period is now 9% of the plan total as opposed to a minimum of 13% as expected by the LPS. This decrease also does not take into account demolitions. This represents a serious shortfall in the second most sustainable settlement in the District and one which is unlikely to be remediated due to Green Belt constraints. Scale of shortfall terms in percentage terms is 22%.</p> <p>Clear that Green Belt release in Burntwood is needed to meet the minimum housing requirements for the settlement as set out in the LPS.</p>	Comments noted.
SIO1107	Quod on behalf of Evans Property Group	Whole Document	<p>These representations promote a Site at Gorse Lane, Fradley as a sustainable location for new residential development for c. 300 new homes as part of a sustainable extension to Fradley. There are no technical or environmental constraints that would prevent it from coming forward. A high proportion of the Site is previously developed land, and comprises two existing businesses. It lies within a single ownership, controlled by Evans Property Group. The spatial strategy is to concentrate growth in and around the most sustainable urban and rural settlements, including Fradley.</p> <p>These representations relate specifically to Options 2 and 3. Notwithstanding this, the Site could form an appropriate component part of Option 4, should the Council deem it necessary and appropriate to adopt the 'new settlement' approach, and it could come forward as part of a wider site, provided by others.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1108	Anwyl Land Ltd (Marc Hourigan)	5	Any amendments will need to ensure consistency with the revised Framework due to be published later in 2018.	Agreed that the revised NPPF will need to be considered through the Local Plan Review process
SIO1109	Quod on behalf of Evans Property Group	23	Focussing development around key rural settlements, specifically Fradley, is appropriate sustainable option for residential growth. The Planning Inspector appointed to determine the soundness of the currently adopted Local Plan noted that residential expansion of Fradley would bolster the provision of facilities in the settlement, and provide a suitable location for development that is outside of the Green Belt, and largely makes use of previously development land. Whilst falling beyond the settlement boundary for Fradley, a large proportion of the Site is brownfield land. It is closely located to a significant number of existing (and indeed future) employment opportunities within Fradley Business Park.	Comments noted.
SIO1110	Anwyl Land Ltd (Marc Hourigan)	9	Broadly speaking the existing LPS Vision is supported subject to it being able to meet development needs going forward which will necessitate the release of Green Belt land for development.	Noted, any development proposed in the Green Belt will need to be influenced by the Green Belt Review
SIO1111	Quod on behalf of Evans Property Group	24	Evans support the identification of Fradley as a Key Rural Settlement. The addition of c. 300 new homes in a sustainable manner at the Site would not change this designation or affect Fradley's position within the settlement hierarchy	Comments noted.
SIO1112	Anwyl Land Ltd (Marc Hourigan)	10	Strategic Objective 1 is supported subject to it being able to accommodate development needs going forward which will necessitate the release of Green Belt land for development.	Comments noted, any development proposed in the Green Belt will need to be influenced by the Green Belt Review
SIO1113	Quod on behalf of Evans Property Group	25	Fradley is a sustainable and appropriate location for new residential development. A revision to the settlement boundary is entirely appropriate in this case given that it is logical, would comprise brownfield land and would not affect Fradley's position in the settlement hierarchy.	Comments noted.
SIO1114	Anwyl Land Ltd (Marc Hourigan)	11	<p>Noted that the Greater Birmingham HMA Strategic Growth Study contains an assessment of how setting minimum density policies can affect the number of houses to be delivered in the Study area. Understands the approach adopted has some value at a strategic level at the more local level a more considered approach is required.</p> <p>The draft revised Framework contains provisions at Paragraph 123 requiring the use of minimum density policies in Development Plans. Yet to be seen whether these provisions will materialise in the published revised Framework but draft requirements contain sufficient flexibility for local and site specific circumstances to be considered in devising policies. Subject to robust site specific and neighbouring area assessment there should be no issue for individual allocations in any new Local Plan to be subject to minimum density requirements. A blanket approach to density is unlikely to be appropriate.</p>	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO1115	Quod on behalf of Evans Property Group	26	Fradley is appropriate sustainable settlement to accommodate further residential growth. The delivery of c. 300 new homes at the Site would not prejudice Fradley's current function as a Key Rural Settlement, and this can be achieved in a manner that would not consume any Green Belt land or land subject to any environmental or technical concerns. It would support existing and planned services, and can be accommodated within the existing (and planned) infrastructure.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1116	Quod on behalf of Evans Property Group	27	Full regard must be had to the position of the Site to the Fradley SDA and specifically the logical, limited and sustainable extension that can be achieved in doing so. The Site is brownfield land that is free from any environmental or technical constraints that would preclude development; this is seen as an opportunity	Comment noted.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1117	Quod on behalf of Evans Property Group	28	Whilst the Site is not considered to be large enough for a new settlement on its own, it is recognised that it forms part of a larger 'developable' site. Therefore, whilst these representations promote the Site for a sustainable urban extension to Fradley under Options 2 and 3, should the Council deem a new settlement strategy appropriate, then the Site is in a highly sustainable location and well placed to align with this spatial strategy. Quod agree with the identification of land 'around Fradley' as a location for a new settlement. It is important to recognise that Fradley is a more appropriate option of the two suggested, given that it lies outside of the Green Belt and no revisions to the Green Belt boundary would be required as a consequence.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1118	Anwyl Land Ltd (Marc Hourigan)	13	There is no basis for requiring developments of their sites to be made available for self-build or custom built homes. However, it could be put simply that the LPA will encourage developments to make provision for such homes without making it a requirement. It would be useful through the Plan making evidence base to know the number of people registered on the Council's Self Build Register.	Comments noted. This will be considered further as the Local Plan Review progresses and will be informed by a range of evidence.
SIO1119	Anwyl Land Ltd (Marc Hourigan)	18	We would support the preparation of an AAP for Burntwood Town Centre.	Comments noted
SIO1120	Anwyl Land Ltd (Marc Hourigan)	21	Supports a strategy that focuses future development in the District around the existing towns especially Burntwood which is in need of regeneration. Seems highly likely that there will be limited opportunities for the reuse of previously developed land in Burntwood to accommodate housing and employment needs and as a consequence the use of greenfield land on the edge of the settlement will need to be considered. Supports the use of a variety of sizes of urban extensions given the lead-in times associated with developments of 500+ dwellings. In February 2014 Hourigan Connolly completed a national study on the delivery of urban extensions. This study considered factors associated with bringing forward major urban extensions of 500+ dwellings before moving on to look at specific case studies from each of the English regions, Scotland and Wales. Based upon the analysis of the results received from Local Authorities, the Study suggest that the delivery of houses from these types of urban extensions takes approximately 9 years from the date upon which work is started on an outline planning application.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1121	Anwyl Land Ltd (Marc Hourigan)	23	Supports a strategy that focuses future development in the District around the existing towns especially Burntwood which is in need of regeneration. Seems highly likely that there will be limited opportunities for the reuse of previously developed land in Burntwood to accommodate housing and employment needs and as a consequence the use of greenfield land on the edge of the settlement will need to be considered. Supports the use of a variety of sizes of urban extensions given the lead-in times associated with developments of 500+ dwellings. In February 2014 Hourigan Connolly completed a national study on the delivery of urban extensions. This study considered factors associated with bringing forward major urban extensions of 500+ dwellings before moving on to look at specific case studies from each of the English regions, Scotland and Wales. Based upon the analysis of the results received from Local Authorities, the Study suggest that the delivery of houses from these types of urban extensions takes approximately 9 years from the date upon which work is started on an outline planning application.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1122	Anwyl Land Ltd (Marc Hourigan)	28	Objects to Residential Growth Option 4: New Settlement. This option will do nothing for Burntwood which is in need of regeneration and the investment that would come through development in the town centre and on the periphery of the settlement. See response to Q21 in regard to timescales involved with these sort of developments.	Comments noted.
SIO1123	Anwyl Land Ltd (Marc Hourigan)	31	Support Burntwood being the focus for future employment in the District and the delivery of this could be complemented through the delivery of more housing around Burntwood thereby maximising sustainability credentials	Comments noted.
SIO1124	Anwyl Land Ltd (Marc Hourigan)	38	Yes the IDP structure is considered appropriate	Comments noted.
SIO1125	Anwyl Land Ltd (Marc Hourigan)	39	Yes it is helpful to know the priorities of the IDP although the 3 priorities identified will need to be rigorously assessed.	Comments noted. Agree the assessment of identified categories will require the support of a robust assessment framework.
SIO1126	Anwyl Land Ltd (Marc Hourigan)	40	Yes it is helpful to know the priorities of the IDP although the 3 priorities identified will need to be rigorously assessed.	Comments noted. Agree the assessment of identified categories will require the support of a robust assessment framework which will ensure that there is clarity surrounding categories.
SIO1127	Janet Hodson on behalf of Mr and Mrs Wiseman	1	Allocation not adopted estimate mid 2019, estimate new LP adopted 2020 therefore suggested plan period from 2020-2040 to achieve certainty re allocations and green belt. Having a Sites and polices DPD confusing and public lack confidence.	Comments noted.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1128	Turley on behalf of Taylor Wimpey	1	<p>The National Planning Policy Framework (NPPF) requires Local Plans to cover an appropriate plan period. Paragraph 157 of the NPPF sets out that Local Plans must be drawn up over an appropriate timescale, preferably a 15-year time horizon, taking account of longer term requirements. The draft NPPF states that strategic policies should look ahead over a minimum 15 year period from adoption (paragraph 22).</p> <p>2.3 Given that the Local Plan Review is programmed to be adopted in December 2020, the proposed period 2020-36 is considered sound. It will, of course, be important that the Local Plan Review timetable is maintained, otherwise the plan period may need to be extended.</p> <p>2.4 The GL Hearn Greater Birmingham Housing Market Assessment Strategic Growth Study (the growth study) considers the housing needs for the Greater Birmingham Housing Market Area (HMA) (which Lichfield sits within) for between 2011 and 2036. It is therefore appropriate for the Local Plan Review to have an end date of 2036 as it aligns with this evidence and allows Lichfield District to deliver an appropriate contribution to the identified shortfall to 2036.</p>	Comments noted.
SIO1129	Janet Hodson on behalf Of Mr and Mrs Wiseman	2	Main evidence relates to housing and employment - update of current including Birmingham unmet needs. Analysis of economic prospects and upward growth impact on housing requirement. Evidence should be clear on how derived and how additions are based on demographic information.	Consideration to undertaking a HEDNA will be undertaken
SIO1130	Janet Hodson on behalf Of Mr and Mrs Wiseman	4	New plan to review Spatial Strategy - review of housing and employment distributions and Lichfield, Burntwood and rural settlement policies, review of green belt changes to CP1 consideration of green belt boundaries around settlements.	The appropriate location of new housing will be considered through the Review process
SIO1131	Turley for Taylor Wimpey	2	<p>Paragraph 61 of the draft NPPF states that the "local housing need assessment" should take account of "...any needs that cannot be met within neighbouring areas". As such, a local housing need assessment will need to be undertaken as part of the Local Plan Review which should assess the District's housing need over the plan period, as well as the needs of the wider HMA, once the final details of the standard methodology have been confirmed.</p> <p>2.6 As part of these representations a Vision Document is enclosed demonstrating the sustainability and deliverability of the site to the south of Rugeley Road, Armitage. The Strategic Housing Land Availability Assessment (SHLAA) should be updated to reflect this new evidence, along with all sites (and evidence) promoted for development. 2.7 The draft National Planning Policy Framework (NPPF) proposes that for a site to be deliverable it should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin in site within five years. 2.8 Should the draft NPPF be published with this definition of deliverability, it will be necessary to update the Urban Capacity Study as a number of sites included in the current study do not meet this definition, particularly sites which are not currently available. 2.9 It is inevitable that Green Belt land will need to be released to meet Lichfield's housing need and the unmet needs of the wider HMA. Therefore a fresh Green Belt Review should also be undertaken to ensure that the District's housing needs are delivered in the most sustainable locations, which will necessitate the release of land from the Green Belt in locations such as Armitage with Handsacre. The north and north east of the village is constrained by flood risk, heritage, and the Trent and Mersey Canal to the north and north east, therefore it is likely that land to the south of the village, which is in the Green Belt, will be necessary. 2.10 The Rural Settlement Sustainability Study should also be updated to reflect the most up to date service provision in each of the rural settlements in the District.</p>	<p>Consideration to undertaking a HEDNA will be undertaken</p> <p>Updates to the Urban Capacity study will be considered</p> <p>Consideration of updating the RSSS will be undertaken</p>
SIO1132	Janet Hodson on behalf Of Mr and Mrs Wiseman	6	do not agree North of Tamworth will not require change - AF Inquiry not available growth uncertain - adverse appeal decision impact on Plan	The Arkall Farm Inquiry resulted in outline permission being granted.
SIO1133	Janet Hodson on behalf Of Mr and Mrs Wiseman	Whole Document (para ref 2.1-22.22 given)	In plan period completions not matching requirements. Due to nature of Strategic allocations. Long time to produce dwellings long lead in times well recognised. New Plan should have a range of sites sizes. This should influence distribution of growth. A plan that relies on large strategic sites will exacerbate the under delivery that has been experienced since 2008.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

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SIO1134	Ralph Barnard	Whole Document	<p>Para 1.16 refers to an evidence base which has been assembled and updated over a number of years - is this available to view.</p> <p>Table 1.3 - CP11 & CP12 should include things voluntary organisations do and Policy HSC2 could be adjusted so they are built to accommodate other activities besides changing facilities.</p> <p>Section 2.1 fails to address the issue of young people needing space for indoor and outdoor activities.</p> <p>Appendix A - Scouting usually require open spaces adjacent to the building (if the changing facilities building has a meeting room of sufficient size for indoor activities this could be considered).</p> <p>Appendix B - Infrastructure Policy IP1 is to be reviewed and needs to consider what exactly is meant by infrastructure in relation to community facilities.</p> <p>Health & Safe communities CP10 - a line in the 'comment; column relating to taking part in youth activities would be helpful. CP11 - youth facilities and organisations can provide this.</p> <p>Appendix C - Open space health and well-being - a lot of these monitoring aspects are relevant to youth facilities and activities and could possibly be helped by input from the voluntary sector.</p> <p>Appendix D - Paragraph D5 we believe that a sustainable community needs youth facilities within it. Paragraph D9 reinforcing the case for facilities / accommodation for youth requirements particularly scouting.</p>	Evidence base available via a link in the electronic version of the consultation document or at https://www.lichfielddc.gov.uk/Council/Planning/The-local-plan-and-planning-policy/Resource-centre/Resource-centre.aspx Although voluntary sector contributions are acknowledged, it is complex to commit a non-local planning authority organisation to the certainty of delivery required for a Local Plan. It is considered that policy HSC2 is already more diverse. All other comments noted.
SIO1135	Janet Hodson on behalf Of Mr and Mrs Wiseman	11	White paper a starting point for local assessment of housing need - economic growth, the relationship to the requirement for new homes still needs factoring into baselines. Strategic Growth Study applies high density - a new plan should not be seduced by high density, many places other than central locations out of character. PP3 experience is enough to recognise high density doesn't always result in attractive places - family homes. This tool should be used sparingly in certain locations. New LP should consider densities appropriate for Lichfield area not whole HMA. Strategic growth study untested regional scale document that does not fit every location. LD should assist in meeting needs of HMA in appropriate locations.	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO1136	Janet Hodson on behalf Of Mr and Mrs Wiseman	12	White paper a starting point for local assessment of housing need - economic growth, the relationship to the requirement for new homes still needs factoring into baselines. Strategic Growth Study applies high density - a new plan should not be seduced by high density, many places other than central locations out of character. PP3 experience is enough to recognise high density doesn't always result in attractive places - family homes. This tool should be used sparingly in certain locations. New LP should consider densities appropriate for Lichfield area not whole HMA. Strategic growth study untested regional scale document that does not fit every location. LD should assist in meeting needs of HMA in appropriate locations.	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase densities. This will be considered further as the Local Plan review progresses.
SIO1137	Janet Hodson on behalf Of Mr and Mrs Wiseman	Whole Document (economic Growth given as heading)	Review of green belt to provide new economic development and expansion. ELAA fails to include such sites.	Comments noted.
SIO1138	Ralph Barnard	3	Mentions sustainable development in terms of environmental economic and social considerations, these latter ones are ones that the voluntary organisation sector must form part.	Comments noted
SIO1139	Janet Hodson on behalf Of Mr and Mrs Wiseman	21	<p>Promotion of land to the east of Shenstone Court off Birmingham Road. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Shenstone acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements potential for additional development requirements to amend green belt boundaries in Shenstone to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this.</p> <p>Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

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SIO1140	Janet Hodson on behalf Of Mr and Mrs Wiseman	22	<p>Promotion of land to the east of Shenstone Court off Birmingham Road. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Shenstone acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements potential for additional development requirements to amend green belt boundaries in Shenstone to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this.</p> <p>Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1141	Janet Hodson on behalf Of Mr and Mrs Wiseman	23	<p>Promotion of land to the east of Shenstone Court off Birmingham Road. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Shenstone acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements potential for additional development requirements to amend green belt boundaries in Shenstone to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this.</p> <p>Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1142	Janet Hodson on behalf Of Mr and Mrs Wiseman	24	<p>Promotion of land to the east of Shenstone Court off Birmingham Road. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Shenstone acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements potential for additional development requirements to amend green belt boundaries in Shenstone to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this.</p> <p>Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1143	Janet Hodson on behalf Of Mr and Mrs Wiseman	25	<p>Promotion of land to the east of Shenstone Court off Birmingham Road. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Shenstone acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements potential for additional development requirements to amend green belt boundaries in Shenstone to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this.</p> <p>Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

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SIO1144	Janet Hodson on behalf Of Mr and Mrs Wiseman	26	<p>Promotion of land to the east of Shenstone Court off Birmingham Road. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Shenstone acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements potential for additional development requirements to amend green belt boundaries in Shenstone to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this.</p> <p>Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1145	Janet Hodson on behalf Of Mr and Mrs Wiseman	27	<p>Promotion of land to the east of Shenstone Court off Birmingham Road. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Shenstone acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements potential for additional development requirements to amend green belt boundaries in Shenstone to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this.</p> <p>Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1146	Janet Hodson on behalf Of Mr and Mrs Wiseman	28	<p>Promotion of land to the east of Shenstone Court off Birmingham Road. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Shenstone acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements potential for additional development requirements to amend green belt boundaries in Shenstone to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this.</p> <p>Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1147	Janet Hodson on behalf Of Mr and Mrs Wiseman	29	<p>Promotion of land to the east of Shenstone Court off Birmingham Road. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Shenstone acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements potential for additional development requirements to amend green belt boundaries in Shenstone to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this.</p> <p>Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

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SIO1148	Janet Hodson on behalf Of Mr and Mrs Wiseman	30	<p>Promotion of land to the east of Shenstone Court off Birmingham Road. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Shenstone acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements potential for additional development requirements to amend green belt boundaries in Shenstone to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this.</p> <p>Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1149	Turley on behalf of Taylor Wimpey	3	<p>The key strategic cross boundary issue which the emerging Local Plan Review must grapple with is the Greater Birmingham HMA shortfall, which has been identified in the Growth Study as a minimum of 60,855 dwellings up to 2036. We welcome Lichfield's commitment to determine and deliver an appropriate contribution to this shortfall and our views on this are provided in response to Q12.</p> <p>2.12 This should take into account Lichfield's significant economic relationship with Birmingham and the Black Country, where the majority of the shortfall arises. The 2011 Census data indicates that 37.1% of all outflows to work from the District are to Birmingham, which is recognised in Lichfield's Economic Development Strategy 2016 to 2020. This is due to the exceptional transport links between Lichfield and Birmingham, including highway, bus and the Cross City train line. Indeed significant improvements are proposed to the railway line by 2020, including more services and additional capacity through the provision of more carriages. This is likely to increase the number of people out-commuting from the District to Birmingham. Beyond Birmingham, 27.6% of all outflows to work from the District are to the Black Country.</p>	Comments noted, LDC will continue to engage with the GBBCHMA to seek to ensure a consistent approach is applied
SIO1150	Turley on behalf of Taylor Wimpey	4, 5, 6, 7	<p>The policies should be reviewed and amended as necessary to ensure that the Local Plan Review meets the District's housing needs and any shortfall from the Greater Birmingham HMA to 2036 in the most sustainable locations. In particular, Core Policy 6 will need to be reviewed to reflect the District's housing need as well as an appropriate contribution to the HMA shortfall (to 2036), and the housing requirement will inform the distribution strategy and spatial strategy (Core Policy 1).</p> <p>2.14 This will necessitate land to be released from the Green Belt and allocated for new homes. We discuss this further in response to Q21-Q30 below.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1151	Turley on behalf of Taylor Wimpey	8,10	<p>It is welcomed that the lack of affordable housing and the delivery of market and affordable homes to meet the District's needs are issues listed in table 3.1. However a significant issue which the Local Plan Review must deal with is ensuring that it delivers an appropriate proportion of the Greater Birmingham HMA housing shortfall to 2036. Contributing to this shortfall should be a key issue listed in the emerging Local Plan Review.</p> <p>2.19 The key issues should also recognise that Green Belt will need to be released if the District is to meet its housing requirement in the most sustainable locations.</p> <p>2.20 These issues should be reflected in the District's strategic objectives set out at Table 5.1 also.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1152	Turley on behalf of Taylor Wimpey	9	<p>The current vision seeks to sustainably locate development. This principle should underpin the vision for the Local Plan Review. This will require the release of Green Belt in order to deliver new homes in the most sustainable locations. The vision should also recognise the District's responsibility to accommodate an appropriate proportion of the Greater Birmingham HMA housing shortfall to 2036.</p>	Comments noted, any development proposed in the Green Belt will need to be influenced by the Green Belt Review The Review does include reference to the GBHMA shortfall.
SIO1153	Turley on behalf of Taylor Wimpey	11	<p>A density policy is not considered to be necessary. Whilst higher densities should be supported in suitable locations such as urban centres which benefit from accessibility to key services and public transport, a prescriptive policy covering the whole District is likely to compromise the delivery of housing developments which provide a mix of house types. In turn, it may lead to developments which are unattractive to the homebuyers and may, in turn, affect the viability of development, contrary to paragraph 173 of the NPPF. 2.24 If the Local Plan Review is to include a density policy, it should be specific to urban centres and public transport nodes (consistent with the draft NPPF) and it must be sufficiently flexible in order to allow development to respond appropriately to its context and to remain viable.</p>	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1154	Turley for Taylor Wimpey	12	<p>Taylor Wimpey welcomes Lichfield's acknowledgement of a likely unmet housing need across the HMA with "...an element of which will fall to be delivered in Lichfield" (paragraph 6.19 of the consultation document). The Local Plan Review provides the mechanism to identify the appropriate contribution from Lichfield District towards this unmet need.</p> <p>2.26 As stated in the consultation document and GL Hearn Strategic Growth Study, the methodology for calculating the housing need is currently in transition following the Government's consultation on a proposed standardised methodology (paragraph 61 of the draft NPPF with details set out in draft revised Planning Practice Guidance (PPG)). The final details of the standard method are expected to be published as part of the adopted revised NPPF during July 2018 and the method is expected to come into force for plans submitted after 2018.</p> <p>2.27 Paragraph 61 of the draft NPPF states that the "local housing need assessment" should take account of "...any needs that cannot be met within neighbouring areas". As such, a local housing need assessment will need to be undertaken and kept up-to-date as part of the Local Plan Review which should assess the District's housing need over the plan period, as well as the needs of the wider HMA, once the final details of the standard methodology have been confirmed.</p> <p>2.28 As an authority within the Greater Birmingham HMA, which shares an administrative boundary and a clear economic and functional relational with Birmingham and the Black Country, Lichfield must recognise its responsibility to accommodate some of the HMA shortfall, which has been identified as a minimum of 60,855 dwellings up to 2036. Lichfield should work with Birmingham and the other HMA authorities to agree an appropriate share of the shortfall to be accommodated within the District. Along with Lichfield's own needs, the shortfall should be delivered in the most sustainable locations.</p> <p>2.29 The draft NPPF states at paragraph 29 that in order to demonstrate effective and ongoing joint working, strategic plan-making authorities should prepare and maintain one or more statements of common ground, documenting the cross boundary matters being addressed and progress in cooperating to address these. 2.30 Irrespective of whether the draft NPPF is published, Lichfield should look to agree a statement of common ground with the relevant HMA authorities as soon as possible to confirm the proportion of the shortfall that it will accommodate. This should be done as soon as possible to ensure there are no delays to the Local Plan Review preparation process. If no agreement is reached, Lichfield should consider providing a proportionate contribution to the unmet need based on all available evidence at the point of submission. This was the approach recommended by the Inspector for the South Staffordshire Site Allocation Document Examination.</p>	Comments noted. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield.
SIO1155	Turley for Taylor Wimpey	21-30	<p>We respond to Q21 to Q30 below.</p> <p>2.32 The most recent Rural Settlement Sustainability Study (2016) recognises that Armitage with Handsacre is the largest rural settlement in the District and is also the most sustainable, scoring high for the number of services and facilities within the settlement and access to other services elsewhere, such as employment and hospital.</p> <p>2.33 New housing should be located in the most sustainable locations, where it can access existing services and facilities. Furthermore, new housing can enhance and maintain the vitality of rural communities and help existing services grow and thrive, as recognised by paragraph 55 of the NPPF and paragraphs 79 and 80 of the draft NPPF.</p> <p>2.34 As the most sustainable rural settlement, Armitage with Handsacre must accommodate an appropriate amount of Lichfield's future housing requirement to be delivered by the Local Plan Review. This will also contribute to maintaining and enhancing the village's existing services and facilities.</p> <p>2.35 Option 2 (page 46 to 47) identifies Armitage with Handsacre as a key rural settlement where development should be focussed. Significantly the opportunities associated with Option 2 (set out at Table 9.1) recognises that this option would:</p> <ul style="list-style-type: none"> • Focus development around the most sustainable settlements in the District • Maximise use of existing infrastructure • Help to support rural services and facilities • Assist with affordability issues <p>2.36 Of the four options these opportunities best reflect published and emerging national planning policy and demonstrate that Option 2 represents the most sustainable strategy for delivering the District's future housing growth. Directing development to these settlements, rather than a more dispersed approach (Option 3) or new settlements (Option 4) also provides the opportunity to deliver more comprehensive development including infrastructure improvements through new development. For example, Taylor Wimpey is exploring opportunities to improve bus services in Armitage with Handsacre as part of their proposals. This will be a benefit for existing residents, as well as new residents at the site.</p> <p>2.37 Options 3 and 4 would also restrict the ability of new development to maintain services and facilities at the most sustainable settlements, given either a lower quantum or development at all would be delivered at locations such as Armitage with Handsacre.</p> <p>Furthermore, the lead in times for new settlements would impact the District's five year housing land supply and its ability to deliver any housing in the short term.</p> <p>2.38 National planning policy is clear that when reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. The majority of Lichfield's most sustainable settlements (including Armitage with Handsacre) are constrained by Green Belt. It will therefore be necessary for Lichfield to review its Green Belt to ensure that development is delivered in the most sustainable locations and to ensure that its boundaries can endure beyond the plan period, post 2036.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1156	How Planning for Grasscroft Homes and Property	whole document	<p>These representations are submitted in relation to a site at Hay End Lane, Fradley and should be read in conjunction with HOW's previous representations to the draft Local Plan Allocations Focused Change Document (February 2018), Publication Document (May 2017) and Call for Sites exercise (May 2017). LDC accepts that the outline planning permissions and Strategic Development sites in Fradley are likely to under deliver. As a result, representations were submitted on behalf of Grasscroft to the draft Local Plan Allocations Focused Change Document (February 2018), Publication Document (May 2017) and Call for Sites exercise (May 2017) to promote the site for a residential allocation within the Local Plan Allocations document.</p> <p>In relation to the Greater Birmingham Housing Market Area and accommodating unmet housing need, it is important that LDC address how much of GBHMA will be met within Lichfield as part of the Local Plan Review. Currently, the document does not directly address this.</p> <p>A number of the other Local Authorities within the GBHMA have committed to assisting in meeting Birmingham's housing shortfall and have suggested an indicative figure of how many dwellings they may be able to accommodate. These include:</p> <ul style="list-style-type: none"> • Solihull - The draft Local Plan document published in November 2016 indicates that Solihull should test the potential to provide a further 2000 dwellings; • North Warwickshire - Draft submission document of the new Local Plan states that a figure of 10% of the shortfall should be tested which would mean a potential additional number of dwellings of 3,790; and • Cannock Chase - The consultation on the Local Plan (Part 2) Issues & Options Development Plan Document ran between the 29th January until 27th March 2017. This document put forward the possibility of accommodating 1,000 additional dwellings. <p>As stated earlier in these representations, the Local Plan Allocations submission document commits to reviewing the Local Plan in full to address the shortfall of housing in the wider Greater Birmingham HMA. Whilst it is positive that the LDC are now fulfilling their commitment in preparing a Local Plan Review, this must address Birmingham's housing shortfall and include an assessment of an indicative figure of how many dwellings Lichfield may be able to accommodate.</p> <p>How Planning consider the site they are promoting for Grasscroft at Hay End Lane, Fradley is a suitable site for residential development and have prepared evidence and a development statement to support their case. The details are attached in full and able to be downloaded via the consultation website.</p>	<p>Site is outside village boundary but is adjacent to a sustainable settlement as identified within the adopted Local Plan Strategy. Outside settlement. Does not wholly comply with current development plan policies in the Local Plan. However site falls within broad area of search for assessment of sites which could contribute to sustainable mixed communities. Site is within mineral safeguarding area. Loss of Grade 3 Agricultural Land may need justification. An SBI and BAS are within 1km and the impact on them may need further investigation. Site is within the Cannock Chase zone of influence therefore mitigation may be required. Question 12 invited comments on how consultees consider the GBHMA need should be met to help LDC to achieve a deliverable proposal.</p>
SIO1157	Burntwood Action Group	23	No - see response to Question 21	<p>Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.</p>
SIO1158	Janet Hodson on behalf Of Mr Neachell	1	Allocation not adopted estimate mid 2019, estimate new LP adopted 2020 therefore suggested plan period from 2020-2040 to achieve certainty re allocations and green belt. Having a Sites and polices DPD confusing and public lack confidence.	<p>Comments noted</p>
SIO1159	Janet Hodson on behalf Of Mr Neachell	2	Main evidence relates to housing and employment - update of current including Brimingham unmet needs. Analysis of economic prospects and upward growth impact on housing requirement. Evidence should be clear on how derived and how additions are based on demographic information.	<p>Consideration to undertaking a HEDNA will be undertaken</p> <p>Consideration of employment land and economic evidence will be undertaken</p>
SIO1160	Janet Hodson on behalf Of Mr Neachell	4	New plan to review Spatial Strategy - review of housing and employment distributions and Lichfield, Burntwood and rural sentiment policies, review of green belt changes to CP1 consideration of green belt boundaries around settlements.	<p>The appropriate location of new housing will be considered through the Review process</p>
SIO1161	Janet Hodson on behalf Of Mr Neachell	6	do not agree North of Tamworth will not require change - AF Inquiry not available growth uncertain - adverse appeal decision impact on Plan	<p>The Arkall Farm Inquiry resulted in outline permission being granted.</p>
SIO1162	Janet Hodson on behalf Of Mr Neachell	Whole Document (para ref 2.1-22.22 given)	In plan period completions not matching requirements. Due to nature of Strategic allocations. Long time to produce dwellings long lead in times well recognised. New Plan should have a range of sites sizes. This should influence distribution of growth. A plan that relies on large strategic sites will exacerbate the under delivery that has been experienced since 2008.	<p>Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.</p>
SIO1163	Janet Hodson on behalf Of Mr Neachell	11	White paper a starting point for local assessment of housing need - economic growth, the relationship to the requirement for new homes still needs factoring into baselines. Strategic Growth Study applies high density - a new plan should not be seduced by high density, many places other than central locations out of character. PP3 experience is enough to recognise high density doesn't always result in attractive places - family homes. This tool should be used sparingly in certain locations. New LP should consider densities appropriate for Lichfield area not whole HMA. Strategic growth study untested regional scale document that does not fit every location. LD should assist in meeting needs of HMA in appropriate locations.	<p>Comments noted. The GBHMA Strategic Growth Study concludes it would be reasonable to assume minimum densities of 35 dwellings per hectare in Lichfield. This will be considered further as the Local Plan review progresses.</p>

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1164	Janet Hodson on behalf Of Mr Neachell	12	White paper a starting point for local assessment of housing need - economic growth, the relationship to the requirement for new homes still needs factoring into baselines. Strategic Growth Study applies high density - a new plan should not be seduced by high density, many places other than central locations out of character. PP3 experience is enough to recognise high density doesn't always result in attractive places - family homes. This tool should be used sparingly in certain locations. New LP should consider densities appropriate for Lichfield area not whole HMA. Strategic growth study untested regional scale document that does not fit every location. LD should assist in meeting needs of HMA in appropriate locations.	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase densities. This will be considered further as the Local Plan review progresses.
SIO1165	Janet Hodson on behalf Of Mr Neachell	Whole Document (economic Growth given as heading)	Review of green belt to provide new economic development and expansion. ELAA fails to include such sites.	Comments noted.
SIO1166	Janet Hodson on behalf Of Mr Neachell	21	Promotion of land to the north of Fazeley adjacent to Robert Peel. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Fazeley/Mile Oak acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes. Specific comment on Option 2 and 3 Key rural settlements potential for additional development requirements to amend green belt boundaries in Fazeley Mile Oak to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this. Land identified in as sustainable location in accompanying plan.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1167	Burntwood Action Group	6	Policy B1 - should be added to the list of policies requiring a major change. There is no justifiable reason, acceptable to residents, for the removal of St Matthews from the Greenbelt and therefore it must be reversed.	This is a matter being addressed by the Local Plan Allocations
SIO1168	Burntwood Action Group	28	Yes – Near Alrewas and Fradley. This land is not in the Green Belt and is close to the A38. The layout of the land suggests that displaced wildlife could migrate to neighbouring land. Yes – North east of Tamworth. This land is not in the Green Belt and is close to the M42. The layout of the land suggests that displaced wildlife could migrate to neighbouring land. No – Shenstone - The land is in the Green Belt.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO1169	Burntwood Action Group	31	Yes – Burntwood Business Park. • Good access from Burntwood Bypass. • Separated from residential areas. • Burntwood needs additional employment opportunities.	Agreed
SIO1170	How Planning for Grasscroft Homes and Property	21	A large portion of Lichfield is covered by Green Belt land, particularly Lichfield City which is shrink wrapped by Green Belt to the immediate north, south and west. LDC should therefore consider on Green Belt sites for housing in the first instance. It is also important that housing development is spread to Towns and Key Rural Villages to ensure that these areas also receive housing growth to meet their needs and to remain sustainable. Relying on sustainable urban extensions to deliver the majority of housing as there is insufficient land in urban areas, will result in long lead in times. It is clear that LDC require more housing now to accommodate the housing shortfall within the Birmingham HMA and therefore smaller deliverable sites need to be identified. Finally, this option will require significant investment in existing infrastructure to accommodate the increase in housing around existing urban areas. On behalf of Grasscroft, we strongly object to option 1 as it is not an appropriate option for growth.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1171	How Planning for Grasscroft Homes and Property	23	Option 2 focuses development across the most sustainable settlements in the district which will maximise the use of existing infrastructure in urban areas as well as help to support rural services and facilities. By identifying smaller more deliverable sites in sustainable locations, the housing requirement is likely to be met more easily. As such, option 2 is considered to be an appropriate option for growth. It is Grasscroft's preferred option and is strongly supported.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1172	How Planning for Grasscroft Homes and Property	24	Grasscroft strongly support the identification of Fradley as a key rural settlement	Comment noted.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1173	How Planning for Grasscroft Homes and Property	27	An opportunity that has not been considered at option 3, is that this option will allow smaller sites to come forward for development quicker than larger strategic sites as identified in the two previous options. Overall, this option is broadly supported as it will allow sites to be delivered in a timely manner however it is not Grasscroft's preferred option as development should be focused at the Districts most sustainable locations, for instance in the Towns and Key Rural Settlements.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1174	How Planning for Grasscroft Homes and Property	30	Strongly object by Grasscroft due to there being sustainable settlements in Lichfield where development should be located, such as the approach identified in option 2. In addition, existing settlements require growth to continue to be sustainable and to meet the housing needs of these areas. Finally, option 4 would result in significant lead in times due to the extensive infrastructure that will be required alongside possible land owner and legal issues which often causes delays to delivering large sites. This is something the Scope, Issues and Options consultation document acknowledges and should be a serious consideration for LDC when assessing the four options. It is apparent the Scope, Issues and Options consultation document is not certain on the locations for any new settlement and options are still being considered which does not provide certainty that this option is suitable.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1175	How Planning for Grasscroft Homes and Property	2	Review of the evidence documents is supported, especially: SHLAA, SHMA, RSSS, Affordable Housing Viability assessment, Green Belt Review and Landscape Character. Should also include Urban Capacity Assessment	Comments noted viability evidence will be considered Updates to the Urban Capacity study will be considered Consideration to undertaking a HEDNA will be undertaken
SIO1176	How Planning for Grasscroft Homes and Property	4	Support amending CP6 and FRAD 1-4	Comments noted
SIO1177	How Planning for Grasscroft Homes and Property	6	Grasscroft, disagree and we request that policy F1 is reviewed. It is likely that additional housing sites outside the current settlement boundaries will be required and therefore this policy will need to be updated accordingly to allow this	Comments noted, the location of new growth will need to be considered during the Review, including in Fazeley
SIO1178	Charlton Hayes (Simon Winner)	12	This evidence base document concluded that a minimum of 630 dwellings per annum were required within the District in order to maintain past trends in job growth. The currently adopted figure is below this level of growth and, to that end, the adopted development plan is planning for a reduction in job growth. To adopt an even lower housing growth target will result in further reduction in economic growth for the District. Such an approach is considered contrary to the economic role of sustainable development as defined by the National Planning Policy Framework. Furthermore, as acknowledged within the Government's consultation document, the standardised methodology does not factor in economic growth. Therefore, to maintain an element of economic growth, it is considered that the adopted housing growth figure within the LPS should be the starting point for the Local Plan Review. In addition, there are housing needs arising from neighbouring authorities which need to be factored into the future growth requirements of Lichfield District. Support 2016, however an alternative could be 2031, in line with Birmingham. Increasing housing densities in order to help address the identified housing shortfall. While such an approach is generally supported, the policy is unlikely to yield significant levels of growth capable of sufficiently addressing housing demand. Furthermore, a blanket approach to housing density fails to factor in site-specific issues and, without individual detailed assessment of each site, it is not possible to ascertain just how many homes will be delivered. Indeed, such an approach also fails to acknowledge sites currently with permission and already under-construction or built-out. Alongside this, increasing density can impact upon site viability (e.g. increased requirement for affordable housing, CIL / S106 contributions). Without examining the financial consequences of this option, the likely impacts cannot be determined. Should the Local Planning Authority diverge from the adopted growth strategy contained within the current development plan then this would represent a significant shift in local planning policy. Such a shift would necessitate further detailed examination of the Council's plans. As such it would be appropriate for Lichfield District Council's proportion of unmet regional housing need to be distributed along comparable lines as those set out in Table 8.1 of Core Policy 6 of the Local Plan Strategy. Given that this policy was deemed sound and adopted in 2015, it would be illogical to divert from this strategy.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy and quantum for growth. This will be informed by a range of evidence.
SIO1179	Charlton Hayes (Simon Winner)	19	Employment and housing needs are interlinked. It is not possible to accurately assess housing needs independently of economic needs. Without such information and detail, it is unclear how the LPA can consult on future employment land allocations. At this stage, the Council is unaware of industry demand and preferred locations.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy.
SIO1180	Charlton Hayes (Simon Winner)	18	It is considered beneficial to produce an Area Action Plan for Cranebrook Quarry. The quarry has a limited working life for its current operational use and will ultimately require some form of restoration. The restoration of the site could deliver a mixed-use development of employment and leisure uses. The employment use would provide balanced and sustainable growth pattern for the District. Also the site can deliver a number of leisure uses, including; New leisure facilities including the delivery of a new marina. to connect into the adjoining canal network and complement the recent canal regeneration works; A new museum and education centre associated with the nearby Staffordshire Hoard Delivery of biodiversity rich heathland banks and remodelling of the eastern quarry wall.	Comments noted. This will be considered further as the Local Plan Review progresses

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1181	Charlton Hayes (Simon Winner)	31	Not considered suitable or sustainable to solely focus employment development to existing areas. The rationale for this conclusion is that such a strategy would lead to a highly imbalanced and unsustainable pattern of growth. The locations referenced within the question are not evenly distributed across the District. In contrast, only 56% of the District's housing growth is being centred upon these locations (Lichfield 35%, Fradley 12%, Burntwood 9%). This disparity will result in future residents of the District having to commute long distances to access employment opportunities. Inevitably, this will increase reliance upon private motorised transport. Such an approach is considered to be conflict with the Framework which promotes "...actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable" (paragraph 17)	Majority of homes still mixed into strategic areas; however, new paragraph 84 in the Revised NPPF is acknowledged- "Planning policies ... should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport (although this is contrary to the core planning principle quoted, but the core planning principles have been revoked in the Revised NPPF and the following is to be considered instead). In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist."
SIO1182	IM Land (Barton Wilmore)	1	Land interests at North East Lichfield Agree the proposed plan period is appropriate and welcome the fact it corresponds with Greater Birmingham HMA Strategic Growth Study. The period should be aligned with other authorities within the GBHMA in line with guidance contained in the NPPG. Paragraph 157 of the NPPF states a 15 year timeline is appropriate	Comments noted
SIO1183	Charlton Hayes (Simon Winner)	32	Cranebrook Quarry site offers a suitable employment opportunity. While the winning of minerals does not fall within the traditional 'B' Use Classes, Cranebrook Quarry is nonetheless an employer. However, unlike the proposed sites, the quarry is centrally located between the key urban locations of Brownhills, Lichfield, Burntwood and Shenstone. Detailed highways analysis has already been undertaken on Cranebrook Quarry. The highway authority have been satisfied that large scale movements would not result in a severe impact upon the highway network so a large-scale strategic employment site in this location will not have adverse impacts upon the highway network; particularly when assessed against the consented level of vehicle trips. No understanding of the likely highway issues arising from the Council's employment land options are known. Cranebrook Quarry site can also help facilitate the regeneration of the adjoining canal network as well as bringing forward ecological benefits through the creation of new habitats. While the development would result in new build form within this locality, the existing site is not a natural landscape; instead it is manmade through the quarrying operations. To that end, the proposal would not adversely impact upon the landscape and, through appropriate master planning within an AAP, a detailed landscaping strategy can be incorporated within any regenerative proposal. While the site is within the Green Belt, such a designation is prevalent across the District, the site's redevelopment would not be in conflict with the designation. Ultimately, the site is bordered by existing, manmade barriers; M6 toll, A5, regenerated canal network and a quarry face on the eastern side of the site. Such features provide clear, defensible barriers beyond which development should be restricted. By focusing development within these barriers, the proposal would not conflict with this purpose of the Green Belt. Summary and Conclusions: Although the Government's draft standardised methodology for calculating housing need indicates a lower housing need in Lichfield District, it is considered that simply adopting such figures as part of the review is not sustainable. Firstly, it would ignore the wealth of evidence provided at the Local Plan Strategy EIP. This evidence led the Inspector to conclude that the adopted housing need figure was sound. Furthermore, as set out in this representation, the Inspector considered that there was no sound evidence to justify lowering the figure. Indeed, the Government's draft calculations for housing need do not factor in economic growth requirements. Adopting the Government's draft figures would result in a change to the Local Plan Strategy as the plan would no longer be supportive of the same levels of economic growth as those previously subject to examination in public. Accordingly, as a starting point, the District Council should start with the current annual housing target. On top of that, it is considered that the District Council will be required to accommodate an element of unmet housing need from the Greater Birmingham housing market area. As set out in the evidence base documentation, Lichfield District provides 3 of only 10 beyond the West Midlands Green Belt that is capable of accommodating significant housing development. It is considered that the outcome of the above housing work will necessitate further housing growth within the District. As a result, and in order to ensure a sustainable future for the District, further employment opportunities need to be provided. Unfortunately, this consultation has been undertaken without an advancement of the necessary evidence base. This is highlighted by paragraph 6.27 of the consultation document which states "An Employment Land Review will be undertaken to take an in depth look at employment land requirements and potential future locations". Although the document acknowledges that the Council is unaware of what its employment land requirements are, the consultation document still proposes two strategies for addressing future economic needs. Neither options are considered suitable as the proposals would result in economic growth being concentrated into small geographical areas. Ultimately, such proposals would lead to an unsustainable pattern of development whereby residents would be reliant upon private motorised transport. No evidence is available to demonstrate that such policies would not severely impact upon the highway network. A more dispersed approach to economic growth is ultimately considered to be a more sustainable. In contrast to the above, the highway impacts of Cranebrook Quarry have recently been assessed by the Highways Authority. The conditions attached to the extant minerals permission allows for substantial vehicular movements from the site on a daily basis. Such movement would not be exceeded by allocating the site for future employment growth. Furthermore, Cranebrook Quarry is located almost equidistant to key urban areas within and adjacent to the District. In allowing economic development to proceed on the site would reduce the need to commute when compared to the Council's current two consultation options. Cranebrook Quarry is considered a sustainably located site for future employment growth. The site's future development for such use would be compatible with relevant designations and would lead to a balanced pattern of growth.	Employment development is inappropriate development in the Green Belt, unlike mineral extraction and temporary buildings, with strengthened Green Belt Policy in the Revised NPPF requiring "considerable evidence" for 'very special circumstances'. The site is also within the Cannock Chase Area of Conservation for extant Policy NR7. The area would create an inappropriate 'doughnut' in the Green Belt here.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1184	IM Land (Barton Wilmore)	2	<p>Land interests at North East Lichfield</p> <p>Evidence base should be updated to cover the new plan period and take account the housing pressure on HMA authorities. This should set adequate baselines based on the most up to date evidence to ensure that a strategic approach is taken to ensuring sufficient housing provision through the lifetime of the Plan. This should include ONS Sub National Population projections which will underpin ONS 2016 based household projects.</p> <p>Consider the Council would be justified in planning a level of housing growth above any baseline position shown by the Standardised Methodology and this should happen to ensure there is sufficient supply available.</p>	Comments noted
SIO1185	IM Land (Barton Wilmore)	3	<p>Land interests at North East Lichfield</p> <p>Support the references relating to the commitment of the Council to work with other authorities within the GBHMA to address the housing shortfall. The review should be prepared on the basis of cross boundary working. Each authority should take a fair proportion of dwellings to ensure the need is met in full.</p> <p>The adopted Birmingham Plan quantified its housing shortfall as 37,900 dwellings. SGS set out an updated housing need of 256,000 - 310,000 dwellings between 2011- 2036 for the HMA. This need should be met using a comprehensive and accountable mechanism. Any ambitions to support economic growth, to deliver affordable housing and to meet unmet housing needs from elsewhere are not negated by this lower figure.</p>	Comments noted
SIO1186	Janet Hodson on behalf Of Mr Neachell	22	<p>Promotion of land to the north of Fazeley adjacent to Robert Peel. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Fazeley/Mile Oak acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes. Specific comment on Option 2 and 3</p> <p>Key rural settlements potential for additional development requirements to amend green belt boundaries in Fazeley Mile Oak to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this.</p> <p>Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1187	Janet Hodson on behalf Of Mr Neachell	23	<p>Promotion of land to the north of Fazeley adjacent to Robert Peel. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Fazeley/Mile Oak acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes. Specific comment on Option 2 and 3</p> <p>Key rural settlements potential for additional development requirements to amend green belt boundaries in Fazeley Mile Oak to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this.</p> <p>Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1188	Janet Hodson on behalf Of Mr Neachell	24	<p>Promotion of land to the north of Fazeley adjacent to Robert Peel. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Fazeley/Mile Oak acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements potential for additional development requirements to amend green belt boundaries in Fazeley Mile Oak to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this. Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1189	Janet Hodson on behalf Of Mr Neachell	25	<p>Promotion of land to the north of Fazeley adjacent to Robert Peel. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Fazeley/Mile Oak acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements potential for additional development requirements to amend green belt boundaries in Fazeley Mile Oak to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this. Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1190	Janet Hodson on behalf Of Mr Neachell	26	<p>Promotion of land to the north of Fazeley adjacent to Robert Peel. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Fazeley/Mile Oak acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements potential for additional development requirements to amend green belt boundaries in Fazeley Mile Oak to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this. Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1191	Janet Hodson on behalf Of Mr Neachell	27	<p>Promotion of land to the north of Fazeley adjacent to Robert Peel. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Fazeley/Mile Oak acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements potential for additional development requirements to amend green belt boundaries in Fazeley Mile Oak to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this. Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

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SIO1192	Janet Hodson on behalf Of Mr Neachell	28	<p>Promotion of land to the north of Fazeley adjacent to Robert Peel. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Fazeley/Mile Oak acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements potential for additional development requirements to amend green belt boundaries in Fazeley Mile Oak to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this.</p> <p>Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1193	Janet Hodson on behalf Of Mr Neachell	29	<p>Promotion of land to the north of Fazeley adjacent to Robert Peel. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Fazeley/Mile Oak acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements potential for additional development requirements to amend green belt boundaries in Fazeley Mile Oak to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this.</p> <p>Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1194	Janet Hodson on behalf Of Mr Neachell	30	<p>Promotion of land to the north of Fazeley adjacent to Robert Peel. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Fazeley/Mile Oak acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements potential for additional development requirements to amend green belt boundaries in Fazeley Mile Oak to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this.</p> <p>Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1195	Janet Hodson on behalf of Walton Homes	1	Allocation not adopted estimate mid-2019, estimate new LP adopted 2020 therefore suggested plan period from 2020-2040 to achieve certainty re allocations and green belt. Having a Sites and polices DPD confusing and public lack confidence.	Comments noted
SIO1196	Janet Hodson on behalf of Walton Homes	2	Main evidence relates to housing and employment - update of current including Brimingham unmet needs. Analysis of economic prospects and upward growth impact on housing requirement. Evidence should be clear on how derived and how additions are based on demographic information.	<p>Consideration to undertaking a HEDNA will be undertaken</p> <p>Consideration of employment land and economic evidence will be undertaken</p>
SIO1197	Janet Hodson on behalf of Walton Homes	4	New plan to review Spatial Strategy - review of housing and employment distributions and Lichfield, Burntwood and rural sentiment policies, review of green belt changes to CP1 consideration of green belt boundaries around settlements.	The appropriate location of new housing will be considered through the Review process
SIO1198	Janet Hodson on behalf of Walton Homes	6	Do not agree North of Tamworth will not require change - AF Inquiry not available growth uncertain - adverse appeal decision impact on Plan	The Arkall Farm Inquiry resulted in outline permission being granted.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1199	Janet Hodson on behalf of Walton Homes	Whole Document (para ref 2.1-22.22 given)	In plan period completions not matching requirements. Due to nature of Strategic allocations. Long time to produce dwellings long lead in times well recognised. New Plan should have a range of sites sizes. This should influence distribution of growth. A plan that relies on large strategic sites will exacerbate the under delivery that has been experienced since 2008.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1200	Janet Hodson on behalf of Walton Homes	11	White paper a starting point for local assessment of housing need - economic growth, the relationship to the requirement for new homes still needs factoring into baselines. Strategic Growth Study applies high density - a new plan should not be seduced by high density, many places other than central locations out of character. PP3 experience is enough to recognise high density doesn't always result in attractive places - family homes. This tool should be used sparingly in certain locations. New LP should consider densities appropriate for Lichfield area not whole HMA. Strategic growth study untested regional scale document that does not fit every location. LD should assist in meeting needs of HMA in appropriate locations.	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO1201	Janet Hodson on behalf of Walton Homes	12	White paper a starting point for local assessment of housing need - economic growth, the relationship to the requirement for new homes still needs factoring into baselines. Strategic Growth Study applies high density - a new plan should not be seduced by high density, many places other than central locations out of character. PP3 experience is enough to recognise high density doesn't always result in attractive places - family homes. This tool should be used sparingly in certain locations. New LP should consider densities appropriate for Lichfield area not whole HMA. Strategic growth study untested regional scale document that does not fit every location. LD should assist in meeting needs of HMA in appropriate locations.	The GBHMA Strategic Growth Study recommends authorities across the HMA increase densities. This will be considered further as the Local Plan review progresses.
SIO1202	Janet Hodson on behalf of Walton Homes	Whole Document (economic Growth given as heading)	Review of green belt to provide new economic development and expansion. ELAA fails to include such sites.	Comments noted.
SIO1203	Janet Hodson on behalf of Walton Homes	21	Promotion of land to the south of Armitage SHLAA ref 92. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Armitage with Handsacre acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes. Specific comment on Option 2 and 3 Key rural settlements potential for additional development requirements to amend green belt boundaries in Armitage with Handsacre to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this. Land identified in as sustainable location in accompanying plan.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1204	Janet Hodson on behalf of Walton Homes	22	Promotion of land to the south of Armitage SHLAA ref 92. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Armitage with Handsacre acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes. Specific comment on Option 2 and 3 Key rural settlements potential for additional development requirements to amend green belt boundaries in Armitage with Handsacre to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this. Land identified in as sustainable location in accompanying plan.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

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SIO1205	Janet Hodson on behalf of Walton Homes	23	<p>Promotion of land to the south of Armitage SHLAA ref 92. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Armitage with Handsacre acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements potential for additional development requirements to amend green belt boundaries in Armitage with Handsacre to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this. Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1206	Janet Hodson on behalf of Walton Homes	24	<p>Promotion of land to the south of Armitage SHLAA ref 92. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Armitage with Handsacre acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements potential for additional development requirements to amend green belt boundaries in Armitage with Handsacre to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this. Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1207	Janet Hodson on behalf of Walton Homes	25	<p>Promotion of land to the south of Armitage SHLAA ref 92. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Armitage with Handsacre acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements potential for additional development requirements to amend green belt boundaries in Armitage with Handsacre to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this. Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1208	Janet Hodson on behalf of Walton Homes	26	<p>Promotion of land to the south of Armitage SHLAA ref 92. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Armitage with Handsacre acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements potential for additional development requirements to amend green belt boundaries in Armitage with Handsacre to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this. Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

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SIO1209	Janet Hodson on behalf of Walton Homes	27	<p>Promotion of land to the south of Armitage SHLAA ref 92. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Armitage with Handsacre acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements potential for additional development requirements to amend green belt boundaries in Armitage with Handsacre to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this. Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1210	Janet Hodson on behalf of Walton Homes	28	<p>Promotion of land to the south of Armitage SHLAA ref 92. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Armitage with Handsacre acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements potential for additional development requirements to amend green belt boundaries in Armitage with Handsacre to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this. Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1211	Janet Hodson on behalf of Walton Homes	29	<p>Promotion of land to the south of Armitage SHLAA ref 92. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Armitage with Handsacre acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements potential for additional development requirements to amend green belt boundaries in Armitage with Handsacre to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this. Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1212	Janet Hodson on behalf of Walton Homes	30	<p>Promotion of land to the south of Armitage SHLAA ref 92. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Armitage with Handsacre acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements potential for additional development requirements to amend green belt boundaries in Armitage with Handsacre to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this. Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

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SIO1213	IM Land (Barton Wilmore)	4	Land interests North East Lichfield Policies relating to supply and location of housing should be fully amended / replaced to take into account the wider HMA need and the Strategic Growth Study. The Spatial Strategy should be amended to reflect this latest evidence base study and the locations within the District which are the most sustainable and suitable for housing. The review of policies is required to ensure they are in line with any updated national guidance of policy.	The appropriate location of new housing will be considered through the Review process
SIO1214	Janet Hodson on behalf of Shipley Estates/Baxter Estate	1	Allocation not adopted estimate mid-2019, estimate new LP adopted 2020 therefore suggested plan period from 2020-2040 to achieve certainty re allocations and green belt. Having a Sites and polices DPD confusing and public lack confidence.	Comments noted
SIO1215	Janet Hodson on behalf of Shipley Estates/Baxter Estate	2	Main evidence relates to housing and employment - update of current including Brimingham unmet needs. Analysis of economic prospects and upward growth impact on housing requirement. Evidence should be clear on how derived and how additions are based on demographic information.	Consideration to undertaking a HEDNA will be undertaken Consideration of employment land and economic evidence will be undertaken
SIO1216	Janet Hodson on behalf of Shipley Estates/Baxter Estate	4	New plan to review Spatial Strategy - review of housing and employment distributions and Lichfield, Burntwood and rural sentiment policies, review of green belt changes to CP1 consideration of green belt boundaries around settlements.	The appropriate location of new housing will be considered through the Review process
SIO1217	Janet Hodson on behalf of Shipley Estates/Baxter Estate	6	Do not agree North of Tamworth will not require change - AF Inquiry not available growth uncertain - adverse appeal decision impact on Plan	The Arkall Farm Inquiry resulted in outline permission being granted.
SIO1218	Janet Hodson on behalf of Shipley Estates/Baxter Estate	Whole Document (para ref 2.1-22.22 given)	In plan period completions not matching requirements. Due to nature of Strategic allocations. Long time to produce dwellings long lead in times well recognised. New Plan should have a range of sites sizes. This should influence distribution of growth. A plan that relies on large strategic sites will exacerbate the under delivery that has been experienced since 2008.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1219	Janet Hodson on behalf of Shipley Estates/Baxter Estate	11	White paper a starting point for local assessment of housing need - economic growth, the relationship to the requirement for new homes still needs factoring into baselines. Strategic Growth Study applies high density - a new plan should not be seduced by high density, many places other than central locations out of character. PP3 experience is enough to recognise high density doesn't always result in attractive places - family homes. This tool should be used sparingly in certain locations. New LP should consider densities appropriate for Lichfield area not whole HMA. Strategic growth study untested regional scale document that does not fit every location. LD should assist in meeting needs of HMA in appropriate locations.	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO1220	Janet Hodson on behalf of Shipley Estates/Baxter Estate	12	White paper a starting point for local assessment of housing need - economic growth, the relationship to the requirement for new homes still needs factoring into baselines. Strategic Growth Study applies high density - a new plan should not be seduced by high density, many places other than central locations out of character. PP3 experience is enough to recognise high density doesn't always result in attractive places - family homes. This tool should be used sparingly in certain locations. New LP should consider densities appropriate for Lichfield area not whole HMA. Strategic growth study untested regional scale document that does not fit every location. LD should assist in meeting needs of HMA in appropriate locations.	The GBHMA Strategic Growth Study recommends authorities across the HMA increase densities. This will be considered further as the Local Plan review progresses.
SIO1221	Janet Hodson on behalf of Shipley Estates/Baxter Estate	Whole Document (economic Growth given as heading)	Review of green belt to provide new economic development and expansion. ELAA fails to include such sites.	Comments noted.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1222	Janet Hodson on behalf of Shipley Estates/Baxter Estate	21	<p>Promotion of land west of Sir Robert Peel Hospital Lichfield Street Mile Oak. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Fazeley Mile Oak acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements potential for additional development requirements to amend green belt boundaries in Fazeley/Mile Oak to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this.</p> <p>Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1223	Janet Hodson on behalf of Shipley Estates/Baxter Estate	22	<p>Promotion of land west of Sir Robert Peel Hospital Lichfield Street Mile Oak. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Fazeley Mile Oak acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements potential for additional development requirements to amend green belt boundaries in Fazeley/Mile Oak to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this.</p> <p>Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1224	Janet Hodson on behalf of Shipley Estates/Baxter Estate	23	<p>Promotion of land west of Sir Robert Peel Hospital Lichfield Street Mile Oak. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Fazeley Mile Oak acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements potential for additional development requirements to amend green belt boundaries in Fazeley/Mile Oak to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this.</p> <p>Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1225	Janet Hodson on behalf of Shipley Estates/Baxter Estate	24	<p>Promotion of land west of Sir Robert Peel Hospital Lichfield Street Mile Oak. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Fazeley Mile Oak acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements potential for additional development requirements to amend green belt boundaries in Fazeley/Mile Oak to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this.</p> <p>Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

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SIO1226	Janet Hodson on behalf of Shipley Estates/Baxter Estate	25	<p>Promotion of land west of Sir Robert Peel Hospital Lichfield Street Mile Oak. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Fazeley Mile Oak acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements potential for additional development requirements to amend green belt boundaries in Fazeley/Mile Oak to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this.</p> <p>Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1227	Janet Hodson on behalf of Shipley Estates/Baxter Estate	26	<p>Promotion of land west of Sir Robert Peel Hospital Lichfield Street Mile Oak. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Fazeley Mile Oak acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements potential for additional development requirements to amend green belt boundaries in Fazeley/Mile Oak to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this.</p> <p>Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1228	Janet Hodson on behalf of Shipley Estates/Baxter Estate	27	<p>Promotion of land west of Sir Robert Peel Hospital Lichfield Street Mile Oak. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Fazeley Mile Oak acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements potential for additional development requirements to amend green belt boundaries in Fazeley/Mile Oak to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this.</p> <p>Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1229	Janet Hodson on behalf of Shipley Estates/Baxter Estate	28	<p>Promotion of land west of Sir Robert Peel Hospital Lichfield Street Mile Oak. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Fazeley Mile Oak acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements potential for additional development requirements to amend green belt boundaries in Fazeley/Mile Oak to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this.</p> <p>Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

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SIO1230	Janet Hodson on behalf of Shipley Estates/Baxter Estate	29	<p>Promotion of land west of Sir Robert Peel Hospital Lichfield Street Mile Oak. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Fazeley Mile Oak acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements potential for additional development requirements to amend green belt boundaries in Fazeley/Mile Oak to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this.</p> <p>Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1231	Janet Hodson on behalf of Shipley Estates/Baxter Estate	30	<p>Promotion of land west of Sir Robert Peel Hospital Lichfield Street Mile Oak. Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Fazeley Mile Oak acknowledged as a Sustainable location in Rural Settlement Sustainability Study 2016 - high score accessibility to services, current services. Appropriate location for substantial growth - land related to existing built up settlement - extension without harm to wider interests. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements potential for additional development requirements to amend green belt boundaries in Fazeley/Mile Oak to accommodate sustainable development. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this.</p> <p>Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1232	IM Land (Barton Wilmore)	8	<p>Land interests North East Lichfield</p> <p>Consider that meeting the housing need across GBHMA is an extremely important issue affecting LDC and therefore should be an issue itself. The strategic element of this need should be highlighted and expressly shown going forward.</p>	The Review does include reference to the GBHMA shortfall.
SIO1233	Janet Hodson behalf of Mr Gough	1	Allocation not adopted estimate mid-2019, estimate new LP adopted 2020 therefore suggested plan period from 2020-2040 to achieve certainty re allocations and green belt. Having a Sites and polices DPD confusing and public lack confidence.	Comments noted
SIO1234	Janet Hodson behalf of Mr Gough	2	Main evidence relates to housing and employment - update of current including Brimingham unmet needs. Analysis of economic prospects and upward growth impact on housing requirement. Evidence should be clear on how derived and how additions are based on demographic information.	<p>Consideration to undertaking a HEDNA will be undertaken</p> <p>Consideration of employment land and economic evidence will be undertaken</p>
SIO1235	Janet Hodson behalf of Mr Gough	4	New plan to review Spatial Strategy - review of housing and employment distributions and Lichfield, Burntwood and rural sentiment policies, review of green belt changes to CP1 consideration of green belt boundaries around settlements.	The appropriate location of new housing will be considered through the Review process
SIO1236	Janet Hodson behalf of Mr Gough	6	Do not agree North of Tamworth will not require change - AF Inquiry not available growth uncertain - adverse appeal decision impact on Plan	The Arkall Farm Inquiry resulted in outline permission being granted.
SIO1237	Janet Hodson behalf of Mr Gough	Whole Document (para ref 2.1-22.22 given)	In plan period completions not matching requirements. Due to nature of Strategic allocations. Long time to produce dwellings long lead in times well recognised. New Plan should have a range of sites sizes. This should influence distribution of growth. A plan that relies on large strategic sites will exacerbate the under delivery that has been experienced since 2008.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1238	IM Land (Barton Wilmore)	10	<p>Land interests North East Lichfield</p> <p>Strategic Priorities should make specific reference to the need to provide dwellings to meet the shortfall across the entire GBHMA. Strategic Objective 6 should be amended to reflect this fact and show that Lichfield District is working towards this.</p>	The Review does include reference to the GBHMA shortfall. However it is recognised that the Plan Review will need to deal with cross boundary issues

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SIO1239	Janet Hodson behalf of Mr Gough	11	White paper a starting point for local assessment of housing need - economic growth, the relationship to the requirement for new homes still needs factoring into baselines. Strategic Growth Study applies high density - a new plan should not be seduced by high density, many places other than central locations out of character. PP3 experience is enough to recognise high density doesn't always result in attractive places - family homes. This tool should be used sparingly in certain locations. New LP should consider densities appropriate for Lichfield area not whole HMA. Strategic growth study untested regional scale document that does not fit every location. LD should assist in meeting needs of HMA in appropriate locations.	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO1240	Janet Hodson behalf of Mr Gough	12	White paper a starting point for local assessment of housing need - economic growth, the relationship to the requirement for new homes still needs factoring into baselines. Strategic Growth Study applies high density - a new plan should not be seduced by high density, many places other than central locations out of character. PP3 experience is enough to recognise high density doesn't always result in attractive places - family homes. This tool should be used sparingly in certain locations. New LP should consider densities appropriate for Lichfield area not whole HMA. Strategic growth study untested regional scale document that does not fit every location. LD should assist in meeting needs of HMA in appropriate locations.	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase densities. This will be considered further as the Local Plan review progresses.
SIO1241	IM Land (Barton Wilmore)	11	Land interest North East Lichfield Agree with the findings of the SGS that density of 35 dph in areas such as Lichfield would be appropriate and reasonable. A policy enforcing this across all development should be avoided as it would not take into account specific circumstances on different sites and their ability to meet a set density standard. A blanket density policy would stifle good design and amenity provision. Need to take into account viability and potential occupiers therefore flexibility is needed when considering density.	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO1242	Janet Hodson behalf of Mr Gough	Whole Document (economic Growth given as heading)	Review of green belt to provide new economic development and expansion. ELAA fails to include such sites.	Comments noted.
SIO1243	Janet Hodson behalf of Mr Gough	21	Promotion of land South West of Hill Ridware village boundary Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Land is available in Hill R4isware to allow for modest development in keeping with the scale and character of the Village. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes. Specific comment on Option 2 and 3 Key rural settlements and other sustainable villages including Hill Ridware should be included within growth option. There should be a tier of village below the key settlements where new development is also acceptable on the basis of the sustainability of the settlement where the development boundaries would be amended to allow for growth. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this. Land identified in as sustainable location in accompanying plan.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1244	Janet Hodson behalf of Mr Gough	22	Promotion of land South West of Hill Ridware village boundary Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Land is available in Hill R4isware to allow for modest development in keeping with the scale and character of the Village. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes. Specific comment on Option 2 and 3 Key rural settlements and other sustainable villages including Hill Ridware should be included within growth option. There should be a tier of village below the key settlements where new development is also acceptable on the basis of the sustainability of the settlement where the development boundaries would be amended to allow for growth. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this. Land identified in as sustainable location in accompanying plan.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

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SIO1245	Janet Hodson behalf of Mr Gough	23	<p>Promotion of land South West of Hill Ridware village boundary Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Land is available in Hill R4isware to allow for modest development in keeping with the scale and character of the Village. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements and other sustainable villages including Hill Ridware should be included within growth option. There should be a tier of village below the key settlements where new development is also acceptable on the basis of the sustainability of the settlement where the development boundaries would be amended to allow for growth. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this.</p> <p>Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1246	Janet Hodson behalf of Mr Gough	24	<p>Promotion of land South West of Hill Ridware village boundary Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Land is available in Hill R4isware to allow for modest development in keeping with the scale and character of the Village. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements and other sustainable villages including Hill Ridware should be included within growth option. There should be a tier of village below the key settlements where new development is also acceptable on the basis of the sustainability of the settlement where the development boundaries would be amended to allow for growth. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this.</p> <p>Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1247	Janet Hodson behalf of Mr Gough	25	<p>Promotion of land South West of Hill Ridware village boundary Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Land is available in Hill R4isware to allow for modest development in keeping with the scale and character of the Village. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements and other sustainable villages including Hill Ridware should be included within growth option. There should be a tier of village below the key settlements where new development is also acceptable on the basis of the sustainability of the settlement where the development boundaries would be amended to allow for growth. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this.</p> <p>Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1248	Janet Hodson behalf of Mr Gough	26	<p>Promotion of land South West of Hill Ridware village boundary Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Land is available in Hill R4isware to allow for modest development in keeping with the scale and character of the Village. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements and other sustainable villages including Hill Ridware should be included within growth option. There should be a tier of village below the key settlements where new development is also acceptable on the basis of the sustainability of the settlement where the development boundaries would be amended to allow for growth. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this.</p> <p>Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

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SIO1249	Janet Hodson behalf of Mr Gough	27	<p>Promotion of land South West of Hill Ridware village boundary Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Land is available in Hill R4isware to allow for modest development in keeping with the scale and character of the Village. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements and other sustainable villages including Hill Ridware should be included within growth option. There should be a tier of village below the key settlements where new development is also acceptable on the basis of the sustainability of the settlement where the development boundaries would be amended to allow for growth. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this.</p> <p>Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1250	Janet Hodson behalf of Mr Gough	28	<p>Promotion of land South West of Hill Ridware village boundary Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Land is available in Hill R4isware to allow for modest development in keeping with the scale and character of the Village. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements and other sustainable villages including Hill Ridware should be included within growth option. There should be a tier of village below the key settlements where new development is also acceptable on the basis of the sustainability of the settlement where the development boundaries would be amended to allow for growth. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this.</p> <p>Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1251	Janet Hodson behalf of Mr Gough	29	<p>Promotion of land South West of Hill Ridware village boundary Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Land is available in Hill R4isware to allow for modest development in keeping with the scale and character of the Village. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements and other sustainable villages including Hill Ridware should be included within growth option. There should be a tier of village below the key settlements where new development is also acceptable on the basis of the sustainability of the settlement where the development boundaries would be amended to allow for growth. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this.</p> <p>Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1252	Janet Hodson behalf of Mr Gough	30	<p>Promotion of land South West of Hill Ridware village boundary Options IN GBG study are untested not part of any DP. Large urban extensions shown delivery problems and delay in bringing land to market. 6 areas around Lichfield replicate these mistakes. Plan should define most appropriate areas of growth - district requirements account local circumstances. Most appropriate - land available in key rural villages and some smaller villages - ensure survival of services and facilities. Land is available in Hill R4isware to allow for modest development in keeping with the scale and character of the Village. Economic Growth & new employment should be distributed in locations attractive to the market in a range of sizes. Do not agree with Town Focused strategy or New Settlement Strategy. Land in key villages and sustainable rural settlements required to support/enhance social facilities including affordable homes.</p> <p>Specific comment on Option 2 and 3</p> <p>Key rural settlements and other sustainable villages including Hill Ridware should be included within growth option. There should be a tier of village below the key settlements where new development is also acceptable on the basis of the sustainability of the settlement where the development boundaries would be amended to allow for growth. Enable wider spread bring substantial benefits to rural communities. Key rural can accommodate sustainable developments over the forthcoming plan period-strategy should reflect this.</p> <p>Land identified in as sustainable location in accompanying plan.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1253	Janet Hodson on behalf of H & E Carthy	1	<p>Allocation not adopted estimate mid-2019, estimate new LP adopted 2020 therefore suggested plan period from 2020-2040 to achieve certainty re allocations and green belt. Having a Sites and polices DPD confusing and public lack confidence.</p>	Comments noted

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SIO1254	Janet Hodson on behalf of H & E Carthy	2	Main evidence relates to housing and employment - update of current including Brimingham unmet needs. Analysis of economic prospects and upward growth impact on housing requirement. Evidence should be clear on how derived and how additions are based on demographic information.	Consideration to undertaking a HEDNA will be undertaken Consideration of employment land and economic evidence will be undertaken
SIO1255	Janet Hodson on behalf of H & E Carthy	4	New plan to review Spatial Strategy - review of housing and employment distributions and Lichfield, Burntwood and rural sentiment policies, review of green belt changes to CP1 consideration of green belt boundaries around settlements.	The appropriate location of new housing will be considered through the Review process
SIO1256	Janet Hodson on behalf of H & E Carthy	6	Do not agree North of Tamworth will not require change - AF Inquiry not available growth uncertain - adverse appeal decision impact on Plan	The Arkall Farm Inquiry resulted in outline permission being granted.
SIO1257	Janet Hodson on behalf of H & E Carthy	Whole Document (para ref 2.1-22.22 given)	In plan period completions not matching requirements. Due to nature of Strategic allocations. Long time to produce dwellings long lead in times well recognised. New Plan should have a range of sites sizes. This should influence distribution of growth. A plan that relies on large strategic sites will exacerbate the under delivery that has been experienced since 2008.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1258	Janet Hodson on behalf of H & E Carthy	11	White paper a starting point for local assessment of housing need - economic growth, the relationship to the requirement for new homes still needs factoring into baselines. Strategic Growth Study applies high density - a new plan should not be seduced by high density, many places other than central locations out of character. PP3 experience is enough to recognise high density doesn't always result in attractive places - family homes. This tool should be used sparingly in certain locations. New LP should consider densities appropriate for Lichfield area not whole HMA. Strategic growth study untested regional scale document that does not fit every location. LD should assist in meeting needs of HMA in appropriate locations.	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO1259	Janet Hodson on behalf of H & E Carthy	12	White paper a starting point for local assessment of housing need - economic growth, the relationship to the requirement for new homes still needs factoring into baselines. Strategic Growth Study applies high density - a new plan should not be seduced by high density, many places other than central locations out of character. PP3 experience is enough to recognise high density doesn't always result in attractive places - family homes. This tool should be used sparingly in certain locations. New LP should consider densities appropriate for Lichfield area not whole HMA. Strategic growth study untested regional scale document that does not fit every location. LD should assist in meeting needs of HMA in appropriate locations.	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase densities. This will be considered further as the Local Plan review progresses.
SIO1260	Janet Hodson on behalf of H & E Carthy	Whole Document (economic Growth given as heading)	Review of green belt to provide new economic development and expansion. ELAA fails to include such sites.	Comments noted.
SIO1261	Janet Hodson on behalf of H & E Carthy	21	GBG study options untested not part of the Development Plan. Large urban extensions slow to deliver and bring land to market. The 6 areas around Lichfield replicate these mistakes. The plan should define most appropriate areas for growth based district requirements accounting for local circumstance. Most appropriate growth option for Lichfield - includes making employment land available at Key rural villages to ensure availability of employment opportunity. Economic growth and employment should be distributed assist in employment land being available in attractive locations range of site sizes. Do not agreed that Town focused strategy or new settlement is appropriate.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1262	Janet Hodson on behalf of H & E Carthy	22	GBG study options untested not part of the Development Plan. Large urban extensions slow to deliver and bring land to market. The 6 areas around Lichfield replicate these mistakes. The plan should define most appropriate areas for growth based district requirements accounting for local circumstance. Most appropriate growth option for Lichfield - includes making employment land available at Key rural villages to ensure availability of employment opportunity. Economic growth and employment should be distributed assist in employment land being available in attractive locations range of site sizes. Do not agreed that Town focused strategy or new settlement is appropriate.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1263	Janet Hodson on behalf of H & E Carthy	23	GBG study options untested not part of the Development Plan. Large urban extensions slow to deliver and bring land to market. The 6 areas around Lichfield replicate these mistakes. The plan should define most appropriate areas for growth based district requirements accounting for local circumstance. Most appropriate growth option for Lichfield - includes making employment land available at Key rural villages to ensure availability of employment opportunity. Economic growth and employment should be distributed assist in employment land being available in attractive locations range of site sizes. Do not agreed that Town focused strategy or new settlement is appropriate.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1264	Janet Hodson on behalf of H & E Carthy	24	GBG study options untested not part of the Development Plan. Large urban extensions slow to deliver and bring land to market. The 6 areas around Lichfield replicate these mistakes. The plan should define most appropriate areas for growth based district requirements accounting for local circumstance. Most appropriate growth option for Lichfield - includes making employment land available at Key rural villages to ensure availability of employment opportunity. Economic growth and employment should be distributed assist in employment land being available in attractive locations range of site sizes. Do not agreed that Town focused strategy or new settlement is appropriate.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

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SIO1265	Janet Hodson on behalf of H & E Carthy	25	GBG study options untested not part of the Development Plan. Large urban extensions slow to deliver and bring land to market. The 6 areas around Lichfield replicate these mistakes. The plan should define most appropriate areas for growth based district requirements accounting for local circumstance. Most appropriate growth option for Lichfield - includes making employment land available at Key rural villages to ensure availability of employment opportunity. Economic growth and employment should be distributed assist in employment land being available in attractive locations range of site sizes. Do not agreed that Town focused strategy or new settlement is appropriate.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1266	Janet Hodson on behalf of H & E Carthy	26	GBG study options untested not part of the Development Plan. Large urban extensions slow to deliver and bring land to market. The 6 areas around Lichfield replicate these mistakes. The plan should define most appropriate areas for growth based district requirements accounting for local circumstance. Most appropriate growth option for Lichfield - includes making employment land available at Key rural villages to ensure availability of employment opportunity. Economic growth and employment should be distributed assist in employment land being available in attractive locations range of site sizes. Do not agreed that Town focused strategy or new settlement is appropriate.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1267	Janet Hodson on behalf of H & E Carthy	27	GBG study options untested not part of the Development Plan. Large urban extensions slow to deliver and bring land to market. The 6 areas around Lichfield replicate these mistakes. The plan should define most appropriate areas for growth based district requirements accounting for local circumstance. Most appropriate growth option for Lichfield - includes making employment land available at Key rural villages to ensure availability of employment opportunity. Economic growth and employment should be distributed assist in employment land being available in attractive locations range of site sizes. Do not agreed that Town focused strategy or new settlement is appropriate.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1268	Janet Hodson on behalf of H & E Carthy	28	GBG study options untested not part of the Development Plan. Large urban extensions slow to deliver and bring land to market. The 6 areas around Lichfield replicate these mistakes. The plan should define most appropriate areas for growth based district requirements accounting for local circumstance. Most appropriate growth option for Lichfield - includes making employment land available at Key rural villages to ensure availability of employment opportunity. Economic growth and employment should be distributed assist in employment land being available in attractive locations range of site sizes. Do not agreed that Town focused strategy or new settlement is appropriate.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1269	Janet Hodson on behalf of H & E Carthy	29	GBG study options untested not part of the Development Plan. Large urban extensions slow to deliver and bring land to market. The 6 areas around Lichfield replicate these mistakes. The plan should define most appropriate areas for growth based district requirements accounting for local circumstance. Most appropriate growth option for Lichfield - includes making employment land available at Key rural villages to ensure availability of employment opportunity. Economic growth and employment should be distributed assist in employment land being available in attractive locations range of site sizes. Do not agreed that Town focused strategy or new settlement is appropriate.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1270	Janet Hodson on behalf of H & E Carthy	30	GBG study options untested not part of the Development Plan. Large urban extensions slow to deliver and bring land to market. The 6 areas around Lichfield replicate these mistakes. The plan should define most appropriate areas for growth based district requirements accounting for local circumstance. Most appropriate growth option for Lichfield - includes making employment land available at Key rural villages to ensure availability of employment opportunity. Economic growth and employment should be distributed assist in employment land being available in attractive locations range of site sizes. Do not agreed that Town focused strategy or new settlement is appropriate.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1271	Janet Hodson on behalf of H & E Carthy	31	Potential for new employment site at Fazeley/Mile Oak and this area should be identified as a new locations. Area good access onto truck road accessible for nearby residential areas. Nee for employment in key rural settlements. Proposed location builds on existing uses already taking place. Land contained by A5 and A513 and Hints road- well contained site position which would attract employers. Location has been identified as a sustainable location given high level of facilities available in Mile Oak/Fazeley - high level connectivity to nearby centres. Development of land would require green belt review but clear well defined boundaries at this location contain the site on all three sides.	Agreed in part. In the general strategic area but would need to be constrained to a necessary area.
SIO1272	Janet Hodson on behalf of H & E Carthy	32	Potential for new employment site at Fazeley/Mile Oak and this area should be identified as a new locations. Area good access onto truck road accessible for nearby residential areas. Nee for employment in key rural settlements. Proposed location builds on existing uses already taking place. Land contained by A5 and A513 and Hints road- well contained site position which would attract employers. Location has been identified as a sustainable location given high level of facilities available in Mile Oak/Fazeley - high level connectivity to nearby centres. Development of land would require green belt review but clear well defined boundaries at this location contain the site on all three sides.	see response to reference SIO1271
SIO1273	Janet Hodson on behalf of H & E Carthy	33	Potential for new employment site at Fazeley/Mile Oak and this area should be identified as a new locations. Area good access onto truck road accessible for nearby residential areas. Nee for employment in key rural settlements. Proposed location builds on existing uses already taking place. Land contained by A5 and A513 and Hints road- well contained site position which would attract employers. Location has been identified as a sustainable location given high level of facilities available in Mile Oak/Fazeley - high level connectivity to nearby centres. Development of land would require green belt review but clear well defined boundaries at this location contain the site on all three sides.	see response to reference SIO1272

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SIO1274	Janet Hodson on behalf of H & E Carthy	34	Potential for new employment site at Fazeley/Mile Oak and this area should be identified as a new locations. Area good access onto truck road accessible for nearby residential areas. Nee for employment in key rural settlements. Proposed location builds on existing uses already taking place. Land contained by A5 and A513 and Hints road- well contained site position which would attract employers. Location has been identified as a sustainable location given high level of facilities available in Mile Oak/Fazeley - high level connectivity to nearby centres. Development of land would require green belt review but clear well defined boundaries at this location contain the site on all three sides.	Support noted for key rural settlement.
SIO1275	Janet Hodson on behalf of H & E Carthy	35	Potential for new employment site at Fazeley/Mile Oak and this area should be identified as a new locations. Area good access onto truck road accessible for nearby residential areas. Nee for employment in key rural settlements. Proposed location builds on existing uses already taking place. Land contained by A5 and A513 and Hints road- well contained site position which would attract employers. Location has been identified as a sustainable location given high level of facilities available in Mile Oak/Fazeley - high level connectivity to nearby centres. Development of land would require green belt review but clear well defined boundaries at this location contain the site on all three sides.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1276	Janet Hodson on behalf of H & E Carthy	36	Potential for new employment site at Fazeley/Mile Oak and this area should be identified as a new locations. Area good access onto truck road accessible for nearby residential areas. Nee for employment in key rural settlements. Proposed location builds on existing uses already taking place. Land contained by A5 and A513 and Hints road- well contained site position which would attract employers. Location has been identified as a sustainable location given high level of facilities available in Mile Oak/Fazeley - high level connectivity to nearby centres. Development of land would require green belt review but clear well defined boundaries at this location contain the site on all three sides.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1277	Pegasus on behalf of Smith Brothers Farms Ltd	3	Key issues identified re Duty to Co-operate listed. In terms of unmet need of GBBCMA - council stated commitment to engage with neighbours - including Tamworth (housing). Concerns on how housing unmet need will be met and in a timely manner. Noted application standard methodology for housing need assessment anticipated summer 2018 - sets out minimum figures affordability ratios does not take account of cross boundary needs . Lichfield overall figure for LPR given proximity of neighbouring authorities that cannot accommodate their housing needs should reflect strategic cross boundary housing needs and be a higher number than that set out in the DCLG standard Methodology.	Comments noted
SIO1278	Pegasus on behalf of Smith Brothers Farms Ltd	1	Yes appropriate. Note Plan due adoption 2020 and plan period 2020-2036 16 timeframe. Appropriate and in line with NPPF Para 157. Reiterated in draft NPPF - minimum 15 years. 2036 ties in with GBHMA SGS Feb2018. Should be committed to review every five year as per NPPF para23.	Comments noted
SIO1279	Pegasus on behalf of Smith Brothers Farms Ltd	2	<p>NPPF and draft NPPF stance on local plans based on proportionate relevant up to date evidence. Following require updating Green Belt Review 2012 Green Belt Review Supplementary Report 2013 Green Belt Supplementary Report 2016 Supplementary Green Belt Report Addendum 2017 Recent report 2016-2017 prepared in contact of LPA, both acknowledge not comprehensive but supplement - consider minor amendments to meet housing requirement in LPS. Appendix A - Green Belt Review "whether there is any specific requirements to amend existing Green Belt boundaries to meet local rather than strategic needs" In light of GBBC HMA - comprehensive review required to meet strategic need and completed in line with draft NPPF guidance.</p> <p>Employment Notes documents that currently make up employment evidence base - Note Appendix A includes action to update ELR to new plan period - agree.</p> <p>Infrastructure IDP living but a number of evidence base studies on infrastructure will require updating to assess emerging spatial options. Transport - Appraisal of Spatial Options Nov 2008 and "Draft Integrated Transport Strategy" 2011 - both will require refresh. Also indoor sports recreation playing pitches health and wellbeing air quality biodiversity renewable low carbon water resources and supply. Viability - evidence base does not encompass an overall Local Plan Viability Assessment - requirement NPPF para 174 in particular note "In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle", and that, "the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened". Draft PPG March 2018 greater emphasis on viability.</p>	<p>Comments noted, consideration of a Green Belt Review will be undertaken</p> <p>Consideration of employment land and economic evidence will be undertaken</p>

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1280	Pegasus on behalf of Smith Brothers Farms Ltd	4	Agree Table 2.1 policies listed require amendment or replacement. If LPA adopted pre LPR likely policies within LPR will also require amendment or replacement.	Comments noted
SIO1281	Pegasus on behalf of Smith Brothers Farms Ltd	5	Agree with Table 1.3 but several other also require minor amendments to either bring them into line with current national policy or update them in the light of further evidence. Core Policy 8: Our Centres and Policy E1.	Agreed that the revised NPPF will need to be considered through the Local Plan Review process
SIO1282	Pegasus on behalf of Smith Brothers Farms Ltd	6	Policy Lichfield 5: East of Lichfield (Streethay) requires updating due to proposed additional housing site L2 200 dwellings should be included in Policy L5 and appendix D updating. Burntwood 5: east of Burntwood out of date development almost built, Appendix F remove. Policy North of Tamworth may require amendment or removal review informed by outcome of SofS decision. Policy East of Rugeley identified a mixed use development 1,130 dwellings in line with Appendix G. However SDA includes Borrow Pit but Policy R1 in LPA Focused Changes Borrow Pit to be retained. Therefore policy out of date requires amending.	Comments noted, the location of new growth will need to be considered during the Review
SIO1283	Pegasus on behalf of Smith Brothers Farms Ltd	7	Trigger for further review of LP should be included. Draft NPPF five years. In the interest of continuous supply to meet identified needs considered reserve sites should be identified within the LP. Believe consideration to safeguarded land in order for Green Belt sites on the edge of settlements to be brought forward in the longer term should need arise. Para 85 and 138 state where necessary areas of safeguarded land between urban and Green belts areas should be identified in the LP in order to meet longer term development needs stretching beyond the plan period.	A review trigger would only be necessary were there something specific that might trigger a review ahead of the NPPF 5 year review timetable
SIO1284	Pegasus on behalf of Smith Brothers Farms Ltd	8	Chapter 2 'Spatial Portrait' highlights the main issues facing the District considered Table 3.1 reads more like a set of objectives numbers 2,3,9 setting out issues to be addressed. Further consideration required.	Comments noted, further assessment will be undertaken
SIO1285	Pegasus on behalf of Smith Brothers Farms Ltd	9	Vision and approach remain relevant and is supported. But consider vision should be more ambitious opportunities in District and wider areas H52 and common wealth games.	Comments noted sub-regional, regional and national initiatives will need to be assessed to identify whether there is scope to incorporate within the vision
SIO1286	Pegasus on behalf of Smith Brothers Farms Ltd	10	Majority of Strategic priorities are considered broadly relevant SP 6 refer only to the needs of Lichfield. It should be amended to also refer to GBHMA and identified as issue 1 within the consultation document and referred to under the previous response to Q2.	The Review does include reference to the GBHMA shortfall. However it is recognised that the Plan Review will need to deal with cross boundary issues
SIO1287	Pegasus on behalf of Smith Brothers Farms Ltd	11	The cu (rep pdf clearly incomplete)	N/A
SIO1288	Pegasus on behalf of Smith Brothers Farms Ltd	12	The (rep pdf clearly incomplete)	N/A
SIO1289	Pegasus on behalf of Smith Brothers Farms Ltd	13	Yes	Comment noted.
SIO1290	Pegasus on behalf of Smith Brothers Farms Ltd	14	Yes	Comment noted
SIO1291	Pegasus on behalf of Smith Brothers Farms Ltd	17	Acknowledged Lichfield Centre Study published 2017 - recent. But, the LPR span 2020-2036 considered should be updated following completion of Friarsgate and other Lichfield City Centre schemes and assess impact of Mill Green Designer Outlet Village (Located CCD) under construction on Burntwood town centre. Distribution of housing growth needs first to be determined before future household expenditure can be estimated and floor space requirements determined. Once the above factors have been resolved this will then better inform the retail and office requirements for the purposes of the LPR>	Comments noted. This will be considered further as the Local Plan Review progresses.
SIO1292	Pegasus on behalf of Smith Brothers Farms Ltd	18	No not support single comprehensive LP is the preferred option updated every five years.	Comments noted. The revised NPPF is due to be published summer 2018 and set out that Local Plan should be reviewed every 5 years.
SIO1293	Pegasus on behalf of Smith Brothers Farms Ltd	19	LPR offers scope to encompass a wide range of development as well as housing, employment and retail include policies and strategic allocations to provide leisure recreation infrastructure and community facilities.	Comments noted. Infrastructure provision will be considered as part of the testing of each option.
SIO1294	Pegasus on behalf of Smith Brothers Farms Ltd	20	Notes changes development to infrastructure in questions box. Understood IDP living document but level of housing employment and retail growth should be determined first in order that the types of infrastructure required can then be established.	Comments noted. The District Council is committed to working with strategy providers, developers and other service providers to enable the sustainable development within the District.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1295	Pegasus on behalf of Smith Brothers Farms Ltd	31	Q31 do not believe that employment growth should not focus solely at Burntwood Fradley and Lichfield City particularly in circumstance where growth is intended to meet the needs of Birm HMA. Must identify most suitable locations to address cross boundary needs. Employment requirement to consider locations with good accessibility to the road network and public transport. Shenstone is just such a location and therefore in respect of Question 32 we believe that there is an opportunity enhance employment provision at Birch brook Industrial Estate.	LDC will have regard to the Local Industrial Strategy. Currently, Shenstone has a Rail station for local services only (unreliable according to the Shenstone Neighbourhood Plan), although this does cover the Greater Birmingham Assessments area; but is less accessible by bus- the 35B is 2 hourly only, and does not cover peak time in its entirety. In addition to its Green Belt location, it has environmental constraints including BMV agricultural land and flood zones.
SIO1296	Pegasus on behalf of Smith Brothers Farms Ltd	32	Q31 do not believe that employment growth should not focus solely at Burntwood Fradley and Lichfield City particularly in circumstance where growth is intended to meet the needs of Birm HMA. Must identify most suitable locations to address cross boundary needs. Employment requirement to consider locations with good accessibility to the road network and public transport. Shenstone is just such a location and therefore in respect of Question 32 we believe that there is an opportunity enhance employment provision at Birch brook Industrial Estate.	see response to reference SIO1295
SIO1297	Pegasus on behalf of Smith Brothers Farms Ltd	33?	Q31 do not believe that employment growth should not focus solely at Burntwood Fradley and Lichfield City particularly in circumstance where growth is intended to meet the needs of Birm HMA. Must identify most suitable locations to address cross boundary needs. Employment requirement to consider locations with good accessibility to the road network and public transport. Shenstone is just such a location and therefore in respect of Question 32 we believe that there is an opportunity enhance employment provision at Birch brook Industrial Estate.	See response to representation SIO1295
SIO1298	Pegasus on behalf of Smith Brothers Farms Ltd	34	Land North of Slade Road Canwell promoted Strongly support identification of land at Bassets Pole as a location for employment growth and agree with Option 2. Bassett's Pole and land identified in Appendix 1 is highly accessible to the strategic highway network and could accommodate development at a scale that could deliver a significant part of the growth requirement. Clearly its location offers the potential to meet cross boundary needs of both Brum Tamworth as well as bring economic benefits to the district.	Land North of Slade Road Canwell is inappropriate for Green Belt development. Support for Bassett's Pole noted.
SIO1299	Pegasus on behalf of Smith Brothers Farms Ltd	35	Land North of Slade Road Canwell promoted Strongly support identification of land at Bassets Pole as a location for employment growth and agree with Option 2. Bassett's Pole and land identified in Appendix 1 is highly accessible to the strategic highway network and could accommodate development at a scale that could deliver a significant part of the growth requirement. Clearly its location offers the potential to meet cross boundary needs of both Brum Tamworth as well as bring economic benefits to the district.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1300	Pegasus on behalf of Smith Brothers Farms Ltd	36	Land North of Slade Road Canwell promoted Strongly support identification of land at Bassets Pole as a location for employment growth and agree with Option 2. Bassett's Pole and land identified in Appendix 1 is highly accessible to the strategic highway network and could accommodate development at a scale that could deliver a significant part of the growth requirement. Clearly its location offers the potential to meet cross boundary needs of both Brum Tamworth as well as bring economic benefits to the district.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1301	IM Land (Barton Wilmore)	12	<p>Land interests North East Lichfield</p> <p>Welcome Council's commitment to meeting a portion of the GBHMA shortfall and consider this commitment should be formally set out in the Local Plan Review. Important to quantify what the unmet need is. There is a shortfall in housing provision which is being planned for of 83,400-134,400 dwellings to 2036 and plans need to be updated to meet this.</p> <p>Lichfield must increase its housing requirement and has opportunities to make significant contribution given its geography, including land beyond the Green Belt, which is not subject to significant constraints, in sustainable locations and with good accessibility to the conurbation by sustainable modes.</p> <p>The Council should work towards an aligned and integrated strategy for housing and economic growth. Assessment of commuting and migration patterns with the conurbation could influence the contribution different areas make to meeting unmet needs alongside constraints and land supply. Consider the Council should test a contribution of at least 15,000 homes in addition to its own development needs. Growth options provided in SGS show how Lichfield can help to provide much needed housing in a sustainable way preserving the Green Belt.</p>	Comments noted. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield.
SIO1302	IM Land (Barton Wilmore)	13	<p>Land interests North East Lichfield</p> <p>Creation of policy relating to self-build should be on the basis of evidence need and therefore given the level of interest registered, it is considered that the most sensible route would be to identify specific sites for self-build and custom house building to reflect the level of interest (Option 1). Requiring a portion of self build building within developments (Option 2) would create supply beyond the demand required and could impact on deliverability.</p> <p>Several other recently adopted Local Plans include policies for self-build in the same way as option 1 and attaches the example of Warwick DC policy.</p>	Comments noted. This will be considered further as the Local Plan Review progresses and will be informed by a range of evidence.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1303	IM Land (Barton Wilmore)	21	<p>Land interests North East Lichfield.</p> <p>Residential Growth Option 1 is the preferred option as it includes land at North East Lichfield. It is included within the Strategic Growth Study. The UCA concluded to meet the needs of the existing Local Plan sites would need to be considered beyond the existing urban areas. The locations in Option 1 provide numerous benefits including sustainable access to jobs, existing infrastructure, located close to where the housing need is generated and sustainable access to travel connections.</p> <p>Confirms land at NE Lichfield enables sustainable growth to Lichfield and avoid the geographic spread of development in less sustainable locations. In the SA Option 1 scores most highly. The NPPF looks to promote sustainable development in rural areas through housing that enhances or maintains the vitality of rural communities. Option 1 would not fetter this, the spatial strategy can provide proportionate growth in sustainable rural locations while placing the majority of need in more sustainable locations highlighted by Option 1.</p> <p>Consider Option 2 to be less sustainable than Option 1 and less favourable to meet the aims of the Council and the wider HMA. Objects to Option 3 as it has limited reference to the Strategic Growth Study and would require high levels of growth to occur to meet the identified housing need. Object to Option 4 as it would provide the least sustainable approach to meeting identified unmet need. Option 4 would create various issues including impacts on landscape, creation of vast infrastructure, delays in the creation of a new community and potential for slower delivery rates.</p> <p>Promotes north east Lichfield and considers growth should be directed towards and adjacent Lichfield in line with Option 1. Confirms land is available and deliverable. It can provide up to 3,000 new dwellings and new facilities and services for new and existing residents including employment / retail, two primary schools and older persons housing. Submits a Vision Document in support of the site.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1304	IM Land (Barton Wilmore)	22	<p>Land interests North East Lichfield.</p> <p>Residential Growth Option 1 is the preferred option as it includes land at North East Lichfield. It is included within the Strategic Growth Study. The UCA concluded to meet the needs of the existing Local Plan sites would need to be considered beyond the existing urban areas. The locations in Option 1 provide numerous benefits including sustainable access to jobs, existing infrastructure, located close to where the housing need is generated and sustainable access to travel connections.</p> <p>Confirms land at NE Lichfield enables sustainable growth to Lichfield and avoid the geographic spread of development in less sustainable locations. In the SA Option 1 scores most highly. The NPPF looks to promote sustainable development in rural areas through housing that enhances or maintains the vitality of rural communities. Option 1 would not fetter this, the spatial strategy can provide proportionate growth in sustainable rural locations while placing the majority of need in more sustainable locations highlighted by Option 1.</p> <p>Consider Option 2 to be less sustainable than Option 1 and less favourable to meet the aims of the Council and the wider HMA. Objects to Option 3 as it has limited reference to the Strategic Growth Study and would require high levels of growth to occur to meet the identified housing need. Object to Option 4 as it would provide the least sustainable approach to meeting identified unmet need. Option 4 would create various issues including impacts on landscape, creation of vast infrastructure, delays in the creation of a new community and potential for slower delivery rates.</p> <p>Promotes north east Lichfield and considers growth should be directed towards and adjacent Lichfield in line with Option 1. Confirms land is available and deliverable. It can provide up to 3,000 new dwellings and new facilities and services for new and existing residents including employment / retail, two primary schools and older persons housing. Submits a Vision Document in support of the site.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

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SIO1305	IM Land (Barton Wilmore)	23	<p>Land interests North East Lichfield.</p> <p>Residential Growth Option 1 is the preferred option as it includes land at North East Lichfield. It is included within the Strategic Growth Study. The UCA concluded to meet the needs of the existing Local Plan sites would need to be considered beyond the existing urban areas. The locations in Option 1 provide numerous benefits including sustainable access to jobs, existing infrastructure, located close to where the housing need is generated and sustainable access to travel connections.</p> <p>Confirms land at NE Lichfield enables sustainable growth to Lichfield and avoid the geographic spread of development in less sustainable locations. In the SA Option 1 scores most highly. The NPPF looks to promote sustainable development in rural areas through housing that enhances or maintains the vitality of rural communities. Option 1 would not fetter this, the spatial strategy can provide proportionate growth in sustainable rural locations while placing the majority of need in more sustainable locations highlighted by Option 1.</p> <p>Consider Option 2 to be less sustainable than Option 1 and less favourable to meet the aims of the Council and the wider HMA. Objects to Option 3 as it has limited reference to the Strategic Growth Study and would require high levels of growth to occur to meet the identified housing need. Object to Option 4 as it would provide the least sustainable approach to meeting identified unmet need. Option 4 would create various issues including impacts on landscape, creation of vast infrastructure, delays in the creation of a new community and potential for slower delivery rates.</p> <p>Promotes north east Lichfield and considers growth should be directed towards and adjacent Lichfield in line with Option 1. Confirms land is available and deliverable. It can provide up to 3,000 new dwellings and new facilities and services for new and existing residents including employment / retail, two primary schools and older persons housing. Submits a Vision Document in support of the site.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1306	IM Land (Barton Wilmore)	24	<p>Land interests North East Lichfield.</p> <p>Residential Growth Option 1 is the preferred option as it includes land at North East Lichfield. It is included within the Strategic Growth Study. The UCA concluded to meet the needs of the existing Local Plan sites would need to be considered beyond the existing urban areas. The locations in Option 1 provide numerous benefits including sustainable access to jobs, existing infrastructure, located close to where the housing need is generated and sustainable access to travel connections.</p> <p>Confirms land at NE Lichfield enables sustainable growth to Lichfield and avoid the geographic spread of development in less sustainable locations. In the SA Option 1 scores most highly. The NPPF looks to promote sustainable development in rural areas through housing that enhances or maintains the vitality of rural communities. Option 1 would not fetter this, the spatial strategy can provide proportionate growth in sustainable rural locations while placing the majority of need in more sustainable locations highlighted by Option 1.</p> <p>Consider Option 2 to be less sustainable than Option 1 and less favourable to meet the aims of the Council and the wider HMA. Objects to Option 3 as it has limited reference to the Strategic Growth Study and would require high levels of growth to occur to meet the identified housing need. Object to Option 4 as it would provide the least sustainable approach to meeting identified unmet need. Option 4 would create various issues including impacts on landscape, creation of vast infrastructure, delays in the creation of a new community and potential for slower delivery rates.</p> <p>Promotes north east Lichfield and considers growth should be directed towards and adjacent Lichfield in line with Option 1. Confirms land is available and deliverable. It can provide up to 3,000 new dwellings and new facilities and services for new and existing residents including employment / retail, two primary schools and older persons housing. Submits a Vision Document in support of the site.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1307	IM Land (Barton Wilmore)	25	<p>Land interests North East Lichfield.</p> <p>Residential Growth Option 1 is the preferred option as it includes land at North East Lichfield. It is included within the Strategic Growth Study. The UCA concluded to meet the needs of the existing Local Plan sites would need to be considered beyond the existing urban areas. The locations in Option 1 provide numerous benefits including sustainable access to jobs, existing infrastructure, located close to where the housing need is generated and sustainable access to travel connections.</p> <p>Confirms land at NE Lichfield enables sustainable growth to Lichfield and avoid the geographic spread of development in less sustainable locations. In the SA Option 1 scores most highly. The NPPF looks to promote sustainable development in rural areas through housing that enhances or maintains the vitality of rural communities. Option 1 would not fetter this, the spatial strategy can provide proportionate growth in sustainable rural locations while placing the majority of need in more sustainable locations highlighted by Option 1.</p> <p>Consider Option 2 to be less sustainable than Option 1 and less favourable to meet the aims of the Council and the wider HMA. Objects to Option 3 as it has limited reference to the Strategic Growth Study and would require high levels of growth to occur to meet the identified housing need. Object to Option 4 as it would provide the least sustainable approach to meeting identified unmet need. Option 4 would create various issues including impacts on landscape, creation of vast infrastructure, delays in the creation of a new community and potential for slower delivery rates.</p> <p>Promotes north east Lichfield and considers growth should be directed towards and adjacent Lichfield in line with Option 1. Confirms land is available and deliverable. It can provide up to 3,000 new dwellings and new facilities and services for new and existing residents including employment / retail, two primary schools and older persons housing. Submits a Vision Document in support of the site.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1308	IM Land (Barton Wilmore)	26	<p>Land interests North East Lichfield.</p> <p>Residential Growth Option 1 is the preferred option as it includes land at North East Lichfield. It is included within the Strategic Growth Study. The UCA concluded to meet the needs of the existing Local Plan sites would need to be considered beyond the existing urban areas. The locations in Option 1 provide numerous benefits including sustainable access to jobs, existing infrastructure, located close to where the housing need is generated and sustainable access to travel connections.</p> <p>Confirms land at NE Lichfield enables sustainable growth to Lichfield and avoid the geographic spread of development in less sustainable locations. In the SA Option 1 scores most highly. The NPPF looks to promote sustainable development in rural areas through housing that enhances or maintains the vitality of rural communities. Option 1 would not fetter this, the spatial strategy can provide proportionate growth in sustainable rural locations while placing the majority of need in more sustainable locations highlighted by Option 1.</p> <p>Consider Option 2 to be less sustainable than Option 1 and less favourable to meet the aims of the Council and the wider HMA. Objects to Option 3 as it has limited reference to the Strategic Growth Study and would require high levels of growth to occur to meet the identified housing need. Object to Option 4 as it would provide the least sustainable approach to meeting identified unmet need. Option 4 would create various issues including impacts on landscape, creation of vast infrastructure, delays in the creation of a new community and potential for slower delivery rates.</p> <p>Promotes north east Lichfield and considers growth should be directed towards and adjacent Lichfield in line with Option 1. Confirms land is available and deliverable. It can provide up to 3,000 new dwellings and new facilities and services for new and existing residents including employment / retail, two primary schools and older persons housing. Submits a Vision Document in support of the site.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

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SIO1309	IM Land (Barton Wilmore)	27	<p>Land interests North East Lichfield.</p> <p>Residential Growth Option 1 is the preferred option as it includes land at North East Lichfield. It is included within the Strategic Growth Study. The UCA concluded to meet the needs of the existing Local Plan sites would need to be considered beyond the existing urban areas. The locations in Option 1 provide numerous benefits including sustainable access to jobs, existing infrastructure, located close to where the housing need is generated and sustainable access to travel connections.</p> <p>Confirms land at NE Lichfield enables sustainable growth to Lichfield and avoid the geographic spread of development in less sustainable locations. In the SA Option 1 scores most highly. The NPPF looks to promote sustainable development in rural areas through housing that enhances or maintains the vitality of rural communities. Option 1 would not fetter this, the spatial strategy can provide proportionate growth in sustainable rural locations while placing the majority of need in more sustainable locations highlighted by Option 1.</p> <p>Consider Option 2 to be less sustainable than Option 1 and less favourable to meet the aims of the Council and the wider HMA. Objects to Option 3 as it has limited reference to the Strategic Growth Study and would require high levels of growth to occur to meet the identified housing need. Object to Option 4 as it would provide the least sustainable approach to meeting identified unmet need. Option 4 would create various issues including impacts on landscape, creation of vast infrastructure, delays in the creation of a new community and potential for slower delivery rates.</p> <p>Promotes north east Lichfield and considers growth should be directed towards and adjacent Lichfield in line with Option 1. Confirms land is available and deliverable. It can provide up to 3,000 new dwellings and new facilities and services for new and existing residents including employment / retail, two primary schools and older persons housing. Submits a Vision Document in support of the site.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1310	IM Land (Barton Wilmore)	28	<p>Land interests North East Lichfield.</p> <p>Residential Growth Option 1 is the preferred option as it includes land at North East Lichfield. It is included within the Strategic Growth Study. The UCA concluded to meet the needs of the existing Local Plan sites would need to be considered beyond the existing urban areas. The locations in Option 1 provide numerous benefits including sustainable access to jobs, existing infrastructure, located close to where the housing need is generated and sustainable access to travel connections.</p> <p>Confirms land at NE Lichfield enables sustainable growth to Lichfield and avoid the geographic spread of development in less sustainable locations. In the SA Option 1 scores most highly. The NPPF looks to promote sustainable development in rural areas through housing that enhances or maintains the vitality of rural communities. Option 1 would not fetter this, the spatial strategy can provide proportionate growth in sustainable rural locations while placing the majority of need in more sustainable locations highlighted by Option 1.</p> <p>Consider Option 2 to be less sustainable than Option 1 and less favourable to meet the aims of the Council and the wider HMA. Objects to Option 3 as it has limited reference to the Strategic Growth Study and would require high levels of growth to occur to meet the identified housing need. Object to Option 4 as it would provide the least sustainable approach to meeting identified unmet need. Option 4 would create various issues including impacts on landscape, creation of vast infrastructure, delays in the creation of a new community and potential for slower delivery rates.</p> <p>Promotes north east Lichfield and considers growth should be directed towards and adjacent Lichfield in line with Option 1. Confirms land is available and deliverable. It can provide up to 3,000 new dwellings and new facilities and services for new and existing residents including employment / retail, two primary schools and older persons housing. Submits a Vision Document in support of the site.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

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SIO1311	IM Land (Barton Wilmore)	29	<p>Land interests North East Lichfield.</p> <p>Residential Growth Option 1 is the preferred option as it includes land at North East Lichfield. It is included within the Strategic Growth Study. The UCA concluded to meet the needs of the existing Local Plan sites would need to be considered beyond the existing urban areas. The locations in Option 1 provide numerous benefits including sustainable access to jobs, existing infrastructure, located close to where the housing need is generated and sustainable access to travel connections.</p> <p>Confirms land at NE Lichfield enables sustainable growth to Lichfield and avoid the geographic spread of development in less sustainable locations. In the SA Option 1 scores most highly. The NPPF looks to promote sustainable development in rural areas through housing that enhances or maintains the vitality of rural communities. Option 1 would not fetter this, the spatial strategy can provide proportionate growth in sustainable rural locations while placing the majority of need in more sustainable locations highlighted by Option 1.</p> <p>Consider Option 2 to be less sustainable than Option 1 and less favourable to meet the aims of the Council and the wider HMA. Objects to Option 3 as it has limited reference to the Strategic Growth Study and would require high levels of growth to occur to meet the identified housing need. Object to Option 4 as it would provide the least sustainable approach to meeting identified unmet need. Option 4 would create various issues including impacts on landscape, creation of vast infrastructure, delays in the creation of a new community and potential for slower delivery rates.</p> <p>Promotes north east Lichfield and considers growth should be directed towards and adjacent Lichfield in line with Option 1. Confirms land is available and deliverable. It can provide up to 3,000 new dwellings and new facilities and services for new and existing residents including employment / retail, two primary schools and older persons housing. Submits a Vision Document in support of the site.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1312	IM Land (Barton Wilmore)	30	<p>Land interests North East Lichfield.</p> <p>Residential Growth Option 1 is the preferred option as it includes land at North East Lichfield. It is included within the Strategic Growth Study. The UCA concluded to meet the needs of the existing Local Plan sites would need to be considered beyond the existing urban areas. The locations in Option 1 provide numerous benefits including sustainable access to jobs, existing infrastructure, located close to where the housing need is generated and sustainable access to travel connections.</p> <p>Confirms land at NE Lichfield enables sustainable growth to Lichfield and avoid the geographic spread of development in less sustainable locations. In the SA Option 1 scores most highly. The NPPF looks to promote sustainable development in rural areas through housing that enhances or maintains the vitality of rural communities. Option 1 would not fetter this, the spatial strategy can provide proportionate growth in sustainable rural locations while placing the majority of need in more sustainable locations highlighted by Option 1.</p> <p>Consider Option 2 to be less sustainable than Option 1 and less favourable to meet the aims of the Council and the wider HMA. Objects to Option 3 as it has limited reference to the Strategic Growth Study and would require high levels of growth to occur to meet the identified housing need. Object to Option 4 as it would provide the least sustainable approach to meeting identified unmet need. Option 4 would create various issues including impacts on landscape, creation of vast infrastructure, delays in the creation of a new community and potential for slower delivery rates.</p> <p>Promotes north east Lichfield and considers growth should be directed towards and adjacent Lichfield in line with Option 1. Confirms land is available and deliverable. It can provide up to 3,000 new dwellings and new facilities and services for new and existing residents including employment / retail, two primary schools and older persons housing. Submits a Vision Document in support of the site.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

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SIO1313	Richborough Estates (Pegasus Neil Cox)	37	<p>Response supported by the following appendix; Site Location Plan, Site and Contextual Analysis Plan, Transport Technical Note, Landscape Visual Statement, Heritage Summary Note, Development Masterplan Option1 and 2. Spatial Strategy should be consistent with vision - which is not changing following spatial strategy in LPR focus on main centres and key settlements. Include cross boundary need, Tamworth, Rugeley and GBHM - may result in other strategic locations. Also higher order smaller settlements included. Preferred option 2 with elements of 3. Promotes the following site Land at Huddlesford Lane Whittington (see appendices) 2.93ha, agricultural field, adjacent to Back Lane, yield 70, Highways see appendix , access onto Back Lane note concludes that the access proposal set out in the Appendix provides the only feasible solution to implementing an improvement to the junction within the adopted highway without creating any detrimental side effects. Social Infrastructure and Accessibility Main street 275 from south side of site location of services. Hourly bus service 75 metre from bus stop. Suggested capacity of 5 at primary school. GP satellite in village hall. Two public rights of way. Natural Environment Green belt. Landscape LHECZ 14 - Land around Whittington. NP evidence base - Ancient settled woodland. Strong landscape boundaries, see appendix and pdf table which assess the site against the purpose of including land within Green belt, overall considered removal of site from greenbelt will not fundamentally undermine the purpose of the Green Belt in this area or in relation to this edge of Whittington. Cultural Heritage See appendix, no listed buildings or structures CA abuts site, nearest listed 150 metres, Article 4 of property adjacent to site. no heritage issues which preclude development of site. Flood risk FZ1 Economic Benefits construction jobs, residents support local services. Development Options 1 70 yield access Back Lane via demolition of 64 Back Lane set back development to reduce impact on CA and Landscape retail existing tress and hedgerows right of way ped link to existing open space. Development Option 2 71 yield access back lane via demolition of 64 Back Lane set back dwellings public right of way remains. Summary development options - efficient use of land, conserve character and appearance of CA. Site logical sustainable extension ability to accommodate significant proportion of future housing needs in the areas, in line with LP requirements and Rural South and East Sub HMA. Free of constraints achievable in five years available now. Deliverable (para 47 NPPF).</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1314	Richborough Estates (Pegasus Neil Cox)	Whole Document	<p>Conclusions: Richborough Estates supports review opportunity review vision SO development requirements, Spatial Strategy and policies. Agree that the Vision and SP set out in LPS remain relevant provide starting point. Delivery of Vision and SP necessary for Whittington to accommodate growth. Residential Growth Option 2 reflects most appropriate starting point most aligned to issues, vision and SP. Whittington is a sustainable settlement - continue to be reflected in an updated settlement hierarchy. LPR opportunities to review Green Belt at Whittington. Existing boundary tight around settlement LPR provides opportunity to review Green Belt for housing needs to 2036 and beyond. LDC Green Belt evidence and evidence submitted in rep highlight land at Huddlesford Lane, Whittington will not fundamentally undermine the purpose of the Green Belt in this areas or in relation to this edge of Whittington. Land at Huddlesford Lane in control of Richborough Estates developable contribute significantly to meeting housing needs region of 70 dwellings no know constraints support the delivery of a new spatial development strategy that focuses development towards the most sustainable locations including key rural villages under Residential Growth Option 2.</p>	Comments noted, support for Residential Growth Option 2. Site is outside village boundary but is adjacent to a Key Rural Settlement as identified within the adopted Local plan Strategy. Within Green Belt. Does not wholly comply with current development plan policies in the Local Plan. However, site falls within broad area for search for assessment of sites which could contribute to sustainable mixed communities. Within Conservation Area. Loss of Grade 2/3 agricultural land may need justification. SBI are BAS are within 1km and the impact on them may need further investigation. Site has potential for protected species. Green Belt review proposed in appendix A of consultation document.
SIO1315	Richborough Estates (Pegasus Neil Cox)	Whole Document	<p>Representation made on behalf of Richborough Estates relates to land at Huddlesford Lane Whittington where Richborough Estates have interest. Pre should be read alongside Site Location Plan, Site and Contextual Analysis Plan, Transport Technical Note, Landscape & Visual Statement, Heritage Summary Note, Development Masterplan Option 1. Development Masterplan Option 2. Rep and Appendix to support the allocation of the land at Huddlesford Land Whittington. Rep framed on LPS and Allocations document to be legally compliant and sound NPPF 182. Planning Policy Context Richborough Estates support LDC decision to review. Opportunity for comprehensive review of vision strategic objectives development requirements spatial development strategy policies. Draft NPPF five years review, current timescales in the LDS will ensure up to day plan. Scope Issues and Options rightfully identifies changes that have occurred since adoption of LPS - evidence base and housing unmet need within GBHMA. Opportunity to align with draft NPPF.</p>	Support for Review noted. Site comment as previous entry.
SIO1316	Richborough Estates (Pegasus Neil Cox)	1	<p>Noted adoption anticipated 2020 plan period 2020-2036 = 16 year timeframe. Considered appropriate and in line with para 157 NPPF and stance of draft NPPF. Plan period will aligned with GBHMA SGS Feb 2018 which considers housing need - time frame 2036.</p>	Comments noted

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SIO1317	Richborough Estates (Pegasus Neil Cox)	2	<p>In light of NPPF requirements the following should be updated. Green Belt LDC 4 Pieces of Green Belt Evidence most recent July 2017. LPR documents refers to the Green Belt review as considering "whether there is any specific requirements to amend existing Green Belt boundaries to meet local rather than strategic need." LPR committed to consider GBBC HMA need consider Green Belt evidence review to address such strategic need. Review in line with NPPF para 135 = strategic Green Belt Study. LPA Supplementary Green Belt report 2016 assess parcels of land around Lichfield, Burntwood, Key Rural Settlements - identified smaller sites to be considered for removed from Green Belt to meet housing need in LPS. Land at Huddlesford Lane was identified for removal through the LPA process but allocation subsequently removed in Focused changes consultation. The removal should be considered through evidence on Green Belt to underpin LPR. Para 1.30 of Scoping Issues and Options anticipates a further Green Belt review document will be required also referenced in Appendix A of document. Housing SSD Housing Needs Study and SHMA 2012 (six years ago) included LDC TBC and CCD report considered demographic housing economic trends date from 2012 based sub national household projections. More recent data 2014 available and it is considered that if national planning policy remains as drafted SHMA should be refreshed in line with latest projections. Also 2016 based data will be published in summer 2018 once available should be used as a baseline for future housing growth. Housing White Paper and Planning for the Right Homes in the Right Places proposed standard Methodology for dwellings requirements if in revised NPPF (July) appropriate to use standard approach. 2014 projections LDC 2016-2026 + 275 households per annum. 2016 affordability ratio 8 + uplift of 24% = further 65 dwellings. Total dwelling requirements 340 per annum. But 2017 affordability ratio 8.5 = 78 dwelling uplift = 353 dwelling per annum. Dwelling requirement likely to change once 2016 population household projection published later in year. Comparing SHMA 410 dwellings and Standard Methodology 353 dwellings clear figures by the new methodology are lower. Due to use of earlier household projections - SHMA identified number of scenarios concluded dwelling requirement of 410 and 450. Standard Methodology only considers latest population projections no affordability ratio, no account for many factor previously considered to ensure housing is aligned with economic aspirations. Recommend further testing of standard methodology to ensure dwelling requires robust to 2036. Work with LEPS understand economic growth and align housing. LDC falls under GBBCHMA acknowledged that some authorities are unable to meet need LDC play a role Duty to Corporate to help met shortfall. Lichfield close to Birmingham and BC and strong functional relationship between the conurbation and settlements in LDC suitable and sustainable locations for growth to assist issue. SHousing needs Study appraised affordable housing partial update in earlier SHMA prior to 2012 now out of date Dynamic model based on Affordable Housing Viability Assessment 2012 needs refreshing. Rural Settlement Sustainability Study (RSSS) published 2016 to inform LPA requires updating review is strategic. Review may result in amendments in hierarchy of settlements should recognise Whittington includes a range of services and facilities including public transport. CCSAC review published in 2017 checked SAMMM still fit for purpose. Review concludes approach fit for current plan but some aspects should be focus of full review to a more comprehensive strategy in future - support and also evidence gathering to inform stage 2 of HRA. Also the following out of date Impact of Recreation to the CCSAC 2012 visitor impact mitigation strategy March 2010 Visitor Survey Feb 2013 review should inform amendments to Policy NR7 LPS 2015 that can be carried through into the LPR. Infrastructure IDP living Document number of evidence base studies require updating to assess emerging spatial options for LPR Draft Integrated transport Strategy 2011, indoor sports recreation playing pitches health and wellbeing air quality biodiversity renewable and low carbon energy water resources and supply. Whittington number of infrastructure aspirations in NP Strategic Aim 5. Viability LDC evidence base does not include a Local Plan Viability Assessment, requirement NPPF para 174 Of particular note is the NPPF's guidance that,</p> <p>"In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle", and that,</p> <p>"the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened" It is therefore considered of paramount importance that a Viability Assessment is undertaken alongside the LPR.</p>	<p>Comments noted, consideration of a Green Belt Review will be undertaken</p> <p>Consideration to undertaking a HEDNA will be undertaken</p>
SIO1318	Staffordshire County Council	Whole Document	<p>Welcomes the opportunity to comment on the document and look forward to working together as the plan progresses. Want to see high level of cooperation and engagement maintained and enhanced through the preparation and implementation of the plan.</p> <p>Early review is triggered by the need to address the GBHMA issues. The consultation document does not provide any robust scenarios on the quantum of any potential additional housing numbers and employment land requirements. Advise that it is essential to establish a fixed and robust set of figures so that the spatial distribution and supporting infrastructure can be shaped in future iterations of the plan preparation.</p> <p>Will continue to work with LDC on preparing an IDP and evidence base documents. Aware secondary education infrastructure is a particularly important issue for District and one the new Local Plan will need to address which includes the potential for a new secondary school. The enabling transport and connectivity infrastructure to support any new developments will of course be of fundamental importance to determining any new strategic site allocations.</p>	<p>Consultation document questions on level of growth invited comments on how consultees consider it should be met in order to help LDC make deliverable proposals.</p>
SIO1319	Staffordshire County Council	1	<p>The Plan period is appropriate</p>	<p>Comments noted</p>

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SIO1320	Staffordshire County Council	2	<p>Broadly supports suggested actions set out in Appendix A, Table A.1</p> <p>Need to consider the current and potential future capacity of education facilities in the District, particularly at Secondary school level. SCC in the process of preparing work on housing needs for older people. Welcome further dialogue on how SCC evidence, supplemented by other housing evidence could help inform the housing mix required for the Plan period.</p> <p>Historic Environment Character Assessment was completed in 2009. Support a review of the document to reflect work on the historic environment that has been undertaken since 2009 and may assist in a better understanding of archaeological potential. Biodiversity Strategy should continue to be based on sound principles including those set out by Lawton and the avoid-mitigate-compensate hierarchy. Continue the net gain approach to biodiversity offsetting.</p> <p>Where possible for large allocation areas, some on-site survey as well as desk-based survey would be useful. The district does not have a comprehensive ecological survey and having an understanding of any likely site constraints at an early stage can help ensure the avoid, mitigate, compensate hierarchy is followed.</p> <p>The SFRA and SWMP need review in light of new information and climate changes.</p>	Comments noted the Council will work with Staffordshire County Council undertaking relevant evidence base
SIO1321	Staffordshire County Council	3	<p>In its broadest sense the key strategic cross boundary issues have been identified. However, when considering the scale and spatial distribution of cross border housing and employment requirements there needs to be further consideration of the associated infrastructure requirements. In particular transport, education and flood risk, for which Staffordshire County Council will need to be involved.</p>	LDC welcome further engagement with SCC on the development of evidence base to inform the LPR associated with these matters
SIO1322	Staffordshire County Council	4	<p>The list of policies to be replaced or significantly amended at this stage seems appropriate. It is assumed that any new or additional policies required will come out through the evolution of the Plan. However, dependent on how the strategy takes shape policies in relation to infrastructure provision and transport may need to be moved into this category.</p>	Comments noted, LDC will continue to work with SCC in developing the Review
SIO1323	Staffordshire County Council	5	<p>Policies surrounding transport and infrastructure may need more significant amendment dependent upon the strategy to be taken forward</p>	Comments noted, LDC will continue to work with SCC in developing the Review
SIO1324	Staffordshire County Council	6	<p>Agreed with the exception of East of Rugeley. The allocation includes the borrow pit lake, which is now to be reconsidered as part of the redevelopment of the remainder of the power station site. It is suggested a minor amendment be required to the policy so it aligns with the wider scheme.</p>	Comments noted
SIO1325	Staffordshire County Council	7	<p>If a new settlement approach is taken forward then new policies surrounding that will be likely. The new version of the NPPF may result in a requirement for a new policy.</p>	Comments noted
SIO1326	Staffordshire County Council	8	<p>Capacity for education infrastructure is an issue that will need to be explored. Any further housing that is directed to Lichfield City or surrounding areas that feed into City secondary schools will require consideration of a new secondary school in a suitable location. Suggested that secondary school place provision is referenced as an issue given the likely scale of land requirement for a new secondary school.</p> <p>Potentially needs to be a specific reference to flood risk. This might be broadly captured by Issue 14 but new development can increase the risk of flooding. Therefore it is suggested that the plan includes Issue 15 - Ensure new development does not increase flood risk and contributes to reducing existing flooding issues where feasible.</p> <p>Questions if there is a need to consider the issue of overnight HGV parking areas given the number of trunk roads that pass through the District.</p> <p>In relation to issue 2 the use of the slash (/) between affordable and specialist accommodation implies an either/or scenario. It is assumed that the intention is for the two to be considered separately? Certainly for specialist accommodation such as extracare or retirement living these could be either market or affordable units. It is suggested therefore that the slash be removed and replaced with the word 'and'.</p>	<p>Comments noted - LDC welcome continual engagement with Staffordshire County Council. The points raised will either in updating the issues and objectives or through the development of the Plan.</p> <p>Comments noted</p>
SIO1327	Richborough Estates (Pegasus Neil Cox)	3	<p>LDC Identify a number of issues to consider under Duty to Co-operate. Unmet housing needs of the GB HMA council commitment to engage including Tamworth Housing needs. Concerns how housing shortfall will be addressed across HMA in a timely manner. Standard Methodology for housing needs sets a minimum figure, does not consider other factors, LDC overall housing figure for LPR due to proximity of neighbours with unmet need should reflect strategic cross boundary housing needs = far higher number than Standard mythology. GL Hearn report identifies minimum shortfall of 60,855.</p>	
SIO1328	Staffordshire County Council	9	<p>Agreed</p>	Comments noted
SIO1329	Staffordshire County Council	10	<p>The strategic priorities remain broadly relevant though probably warrant the inclusion of broadband infrastructure to assist with reducing need to travel (home working, online shopping etc.).</p>	Comments noted - LDC welcome continual engagement with SCC

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SIO1330	Staffordshire County Council	11	In certain locations and situations a density policy may be appropriate to make best use of the land available. Further consideration should be given to how non-developable areas in a site are considered.	Comments noted.
SIO1331	Richborough Estates (Pegasus Neil Cox)	4	Agree	Comments noted
SIO1332	Richborough Estates (Pegasus Neil Cox)	5	Agree with Table 1.3 but several other also require minor amendments to either bring them into line with current national policy or update them in the light of further evidence. Core Policy 8: Our Centres and may necessitate changes to the Hierarchy of centres.	The revised NPPF will need to be considered through the Local Plan Review process Comments noted, policy CP 8 will be considered through the Review.
SIO1333	Richborough Estates (Pegasus Neil Cox)	6	Policy Burntwood 5 is now considered to be out of date as the development is almost built out. Policy East of Rugeley is now out-of-date and requires amending accordingly. Policy North of Tamworth may require amendment through the review process as this plan approval places a number of conditions which could restrict delivery. Policy East of Rugeley mixed use development 1130 dwellings in line with Appendix G LPS however includes Borrow Pit but Policy R1 LPA retains this features therefore no longer deliver 450 therefore policy East of Rugeley out of date.	Comments noted, the location of new growth will need to be considered during the Review
SIO1334	Richborough Estates (Pegasus Neil Cox)	7	Additional policies trigger for review of plan should be included. Reserve sites should be identified. Consideration to safeguarding land in order for Green Belt sites on settlement edges may be brought forward if required. This is supported by NPPF and Draft NPPF - Green Belt should be identified in Local Plans in order to meet longer term development needs stretching well beyond the Plan period.	A review trigger would only be necessary were there something specific that might trigger a review ahead of the NPPF 5 year review timetable
SIO1335	Richborough Estates (Pegasus Neil Cox)	Whole document	Existing issues the vision and SP are set out in LPS 2015. Agree that these will remain broadly relevant as a starting point for LPR.	Comments noted.
SIO1336	Richborough Estates (Pegasus Neil Cox)	8	Table 3.1 reads more like a set of objectives with only number 2, 3 and 9 setting out issues to be addressed.	Comments noted a review of the objectives and there delivery will be undertaken
SIO1337	Richborough Estates (Pegasus Neil Cox)	9	Vision and approach remain relevant and is supported. But consider vision should be more ambitious opportunities in District and wider areas HS2 and common wealth games.	Comments noted sub-regional, regional and national initiatives will need to be assessed to identify whether there is scope to incorporate within the vision
SIO1338	Richborough Estates (Pegasus Neil Cox)	10	Majority of Strategic priorities are considered broadly relevant SP 6 refer only to the needs of Lichfield. It should be amended to also refer to BBGMA and identified as issue 1 within the consultation document and referred to under the previous response to question 2 of this consultation. Levels of Growth Chapter 6 states "different types and levels of growth that will need to be considered and potentially accommodated through the LPR process" but significant level of growth will relate to GBHMA. No indication of the proportion of identified unmet need will be considered through the review process. Understand co-operate with LPA and GBHMA other areas North Warwickshire and Solihull have identified a quantities commitment. Accepted GBHMA identifies a range of strategic growth options and the LPR should consider all relevant further options that could boost housing supply in District.	The Review does include reference to the GBHMA shortfall. However it is recognised that the Plan Review will need to deal with cross boundary issues
SIO1339	Richborough Estates (Pegasus Neil Cox)	11	NPPF and draft NPPF stance on local plans based on proportionate relevant up to date evidence. Following require updating Green Belt Review 2012 NPPF advises LA to set own approach to housing density to reflect local circumstance. Draft NPPF advises anticipated shortage of housing LA to use minimum density standard for city and town centres and other locations that are well served by Transport, and those standards should seek uplift in average density of residential development in those areas unless strong reasons why this would be inappropriate, also notes could set a range of densities that reflect the accessibility and potential of different areas. LDC is a diverse in density, if density standards are incorporated in LPR should be minimum making reference to character of the local areas and the housing mix determined by local need. May require a variety of densities.	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO1340	Richborough Estates (Pegasus Neil Cox)	12	LPR identifies unmet shortfall from GBHMA and element to fall to Lichfield to be delivered. DC should assist in meeting these unmet needs through identifying additional land for development in sustainable location and in making best use of existing infrastructure in sustainable locations with strong links to the conurbation. Could require a range of development options in a range of settlements. Also consider benefits to the District, unlocking government funding for economic growth, LEPS.	Comments noted. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield.
SIO1341	Staffordshire County Council	12	LDC need to take some of the unmet need arising from the GBHMA. It is essential to establish early on what the scale of that need LDC should be providing. Without such it will not be possible to accurately determine the likely infrastructure provision required to support growth. Generally 5000 new houses would support the need of a new secondary school, but other factors would also need to be considered such as demographics, housing trajectories and evidence of higher child yields, which has previously been seen in Lichfield.	Comments noted. Infrastructure provision will be considered as part of the testing of each option.
SIO1342	Richborough Estates (Pegasus Neil Cox)	13	A priority of the government is to boost housing delivery through a variety of means self build and custom housing building being one. NPPF and Draft NPPF give explicit support and para 159 LPA duty to assess the local demand of self build plots. In terms of facilitating this in LDC identification of specific sites for development is favoured - enable needs of local people to be met. Recommend that these sites are specifically allocated as self build/custom build housing sites within the LPR.	Comments noted. This will be considered further as the Local Plan Review progresses and will be informed by a range of evidence.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1343	Richborough Estates (Pegasus Neil Cox)	14	LPS undertake a strategic review of land within their ownership to identify smaller plots and sites. Planning briefs to provide certainty. Recognised not always suitable as not all LPS have large land holdings.	Comments noted. This will be considered further as the Local Plan Review progresses and will be informed by a range of evidence.
SIO1344	Richborough Estates (Pegasus Neil Cox)	17	Lichfield Centres Study published 2017 recent but LPR will span 2020-2026 consider evidence updated following completion of Friargate and Lichfield City Centre and Mill Green Designer Outlet Village CCD which is under construction. Once above factors resolved better informed the retail and office requirements for the purpose of the LPR	Comments noted. This will be considered further as the Local Plan Review progresses.
SIO1345	Wallace Land - Hospital Road (Planning Prospects)	21	<p>Promotes land off Hospital Road, Burntwood Residential Option 1 is the most logical and appropriate growth strategy to strategically deliver growth over the Plan period. However, focusing development in just two urban locations does not distribute growth or benefits of growth and is ultimately not a sustainable option on its own.</p> <p>Residential Option 2 reflects the adopted Local Plan Strategy and is failing to deliver the housing requirement for the District. Burntwood has seen limited growth and is capable of delivering additional development. Release of green belt land is essential to provide for a deliverable range and scale of new development appropriate to Burntwood. Burntwood is a strategic location for growth under Residential Option 1 and 2 but is bound by Green Belt. It is inevitable that the release of Green Belt will be required to enable any further strategic level of growth in and around the settlement. Given the likely level of growth a combination of SUE (500 plus) and medium scale developments (up to 500) would be the most logical choice for delivery.</p> <p>Option 3 - which it is recognised that there are benefits in directing some limited growth to the rural areas this option is unlikely to deliver the level of growth required by the Local Plan and will not be sustainable to deliver higher levels of growth. Housing delivery is likely to be less.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1346	Richborough Estates (Pegasus Neil Cox)	18	Not favoured a single comprehensive plan is preferred updated at least every five years. Minimise resource improve consistency and clarity. Local plan matters could be considered through NPs Whittington and Fisherwick NP made negates the need for additional DPD for Whittington. Note LPR review may result in inconsistencies with NP e.g. increased level of growth in an area.	Comments noted. The revised NPPF is due to be published summer 2018 and set out that Local Plan should be reviewed every 5 years.
SIO1347	Richborough Estates (Pegasus Neil Cox)	19	LPR should also include policies and strategic allocations necessary to provide appropriate leisure, recreation infrastructure and community facilities.	Comments noted. Infrastructure provision will be considered as part of the testing of each option.
SIO1348	Staffordshire County Council	13	Yes. The plan should consider modern methods of construction. Self build and custom build plots can encourage smaller builders to the market and help maintain delivery rates.	Comments noted
SIO1349	Richborough Estates (Pegasus Neil Cox)	20	IDP will inform the new development strategy level of housing employment retail growth should be determined first. Richborough Estates consider residential development focused in Whittington could assist in supporting exiting and providing social physical and green infrastructure in a timely manner to ensure any impacts of development are mitigated and assist in delivering NP objectives.	Comment noted. The District Council is committed to working with strategy providers, developers and other service providers to enable the sustainable development within the District.
SIO1350	Staffordshire County Council	14	Consideration could be given to a policy requirement for larger allocations to make available a proportion of their site for self or custom build and/or the provision of serviced plots.	Comments noted. This will be considered further as the Local Plan Review progresses and will be informed by a range of evidence.
SIO1351	Richborough Estates (Pegasus Neil Cox)	Whole Document	Residential Growth Options Identification of broad strategic options could be considered alone or in combination as potential spatial strategies to deliver the growth requirements of the District is supported. These four options reflect originally considered to inform development of LPS and broad enough to encompass the areas of search for GBHMA. Richborough Estates wish to express the following in respect of the Residential Growth Options albeit reserve the right to provide further views once the appropriate quantum of residential development has been identified.	Comments noted.
SIO1352	Staffordshire County Council	17	To be confirmed	N/A
SIO1353	Staffordshire County Council	19	Further to the response to Q8, the Local Plan may wish to consider the development of overnight HCV parking facilities. Dependent upon the outcome of any SFRA there may need to be consideration for flood defences.	Comments noted. The inclusion of new policies will be considered as the Local Plan Review progresses.
SIO1354	Staffordshire County Council	21	Approach mirrors the current LPS. This approach would therefore on the face of it continue to be an appropriate option for growth for further assessment	Comments noted.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1355	Staffordshire County Council	22	<p>In relation to education infrastructure developments of more than 750 dwellings are generally of sufficient size to require a new primary school. A larger two form entry primary school (420) would support somewhere in the region of 1,500 to 2,000 dwellings.</p> <p>Primary School Infrastructure Many primary schools in Lichfield City are full to capacity with little or no room to expand, it may be difficult to accommodate growth from brownfield sites unless a new site for a primary school can be found. New proposed primary schools south of Lichfield City may provide some opportunity for further housing in those areas up to 450 dwellings with the necessary education contributions being sought. Burntwood primary schools are at or near capacity. Some school sites could accommodate expansion. North of Tamworth Browns Lane and Anker Valley secured education contributions to provide a new 1FE primary school. Arkall Farm to provide primary school on site. Area northwest of Tamworth primary schools are at or near capacity. Expansion planned at Cotton Green Primary School. Brownhills the nearest SCC school is St Peter's at Stonnall with no capacity for expansion and the same for Rugeley. An urban extension which could deliver the necessary additional primary school infrastructure on site would be necessary in this area and education contributions sought to build the new provision. Little Aston / Sutton Coldfield the nearest SCC school is Little Aston Primary school which could potentially be expanded by 1/2 form.</p> <p>Secondary Education Further housing beyond the LPS will necessitate the need for a fourth high school. Little Aston and land north of Brownhills are areas served by Lichfield schools. A new high school would need to be minimum 5FE and preferable 7/8FE. A minimum of 5,000 dwellings would be required as an urban extension to begin to make a new secondary school viable. Burntwood there is some potential to increase high school provision at the existing schools with appropriate education contributions from developers. Rugeley is served by a single high school which operates across two sites. The school has consulted on potential consolidation onto a single site and this will offer limited scope for expansion in the future. Tamworth is served by five academy secondary schools. There may be potential to increase secondary school provision on the Rawlett site through new build with appropriate education contributions depending on the quantum of development proposed. There is significant local transport constraints to North of Tamworth.</p>	Comments noted.
SIO1356	Richborough Estates (Pegasus Neil Cox)	21	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1357	Richborough Estates (Pegasus Neil Cox)	22	<p>Residential Growth Option (Town Focused) benefits - re-using brownfield land utilising infrastructure, supporting existing services and facilities, high density where appropriate, allow for urban extensions outside LDC boundaries assist in meeting cross boundary needs, meet needs close to where they arise, wide range of types and tenures, delivery green infrastructure, community sporting facilities through urban extensions. But other sustainable settlements e.g. Whittington would see population decline services and facilities lost. Town focused growth places pressure on services and facilities within those settlements. Consider Green Belt release on edge of settlements such as Whittington provide long term options for housing employment - alleviate pressure on existing urban areas.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1358	Richborough Estates (Pegasus Neil Cox)	23	<p>Town & Key Rural Village Focused Development continuation of the spatial strategy in LPS 2015. Focus on main urban areas slightly reduced level than Option 1 and modest growth in rural settlements. Considered the appropriate option for housing growth to 2036 greater range of sustainable sites increase housing choice. Settlements identified suitable to remain key rural settlements - good level of services and facilities and accessibility to services in higher order settlements. But opportunity to update RSSS new evidence to categorise settlements, changes and new settlements could be added. Provide a range of housing types in sustainable locations in line with BSGS. Housing in these areas would help maintained services. Challenges highlighted, more likely greenfield leading green belt boundary changes. But should see this not as challenge LPR offers opportunity to re-examine settlement and Green Belt boundaries. Consider allocating sites beyond such boundaries and that should be redefined as necessary through the LPR process. Whittington is one of a handful of sustainable villages within the District and is recognised as a highly sustainable location for development serving local residents and other outlier villages, Richborough Estates consider that the distribution of development under this option should be proportionate to the sustainability credentials of each settlement. Therefore under this option Whittington should continue its role as a focus for sustainable rural growth to 2036 and beyond.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1359	Richborough Estates (Pegasus Neil Cox)	24	Town & Key Rural Village Focused Development continuation of the spatial strategy in LPS 2015. Focus on main urban areas slightly reduced level than Option 1 and modest growth in rural settlements. Considered the appropriate option for housing growth to 2036 greater range of sustainable sites increase housing choice. Settlements identified suitable to remain key rural settlements - good level of services and facilities and accessibility to services in higher order settlements. But opportunity to update RSSS new evidence to categorise settlements, changes and new settlements could be added. Provide a range of housing types in sustainable locations in line with BSGS. Housing in these areas would help maintained services. Challenges highlighted, more likely greenfield leading green belt boundary changes. But should see this not as challenge LPR offers opportunity to re-examine settlement and Green Belt Boundaries. Consider allocating sites beyond such boundaries and that should be redefined as necessary through the LPR process. Whittington is one of a handful of sustainable villages within the District and is recognised as a highly sustainable location for development serving local residents and other outlier villages, Richborough Estates consider that the distribution of development under this option should be proportionate to the sustainability credentials of each settlement. Therefore under this option Whittington should continue its role as a focus for sustainable rural growth to 2036 and beyond.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO1360	Staffordshire County Council	23	Follows a similar theme to Option 1 and providing future growth to key rural settlements may help sustain them. As such it is considered this is an appropriate option for consideration	Comments noted
SIO1361	Staffordshire County Council	24	Agreed	Comment noted.
SIO1362	Richborough Estates (Pegasus Neil Cox)	26	Dispersed Growth would be distributed across a wide range of settlements - considered those listed with identified settlement boundaries represent the most sustainable settlements within the District. Note consideration of smaller settlements and hamlets via Green Belt review updated evidence base. Green Belt review welcomed this approach should extend to all other Green Belt settlements listed under options 1 and 2. Option would meet housing need where they arise support village services and facilities in isolation this option would be least sustainable growth option. Combining other options with growth at some of the more sustainable smaller settlements may therefore be a more suitable strategy for the LPR.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1363	Staffordshire County Council	25	<p>Primary Education Fradley there are issues for further growth on primary school infrastructure. St Stephens's primary serves Fradley and its being expanded. A new school is being delivered and these will mitigate the impact of development in Fradley from the LPS and neither school offers flexibility for expansion. Additional housing need to come forward on a site which is sufficient size to deliver its own primary school. Alrewas All Saints CE is existing school and proposed to be expanded. This would provide some flexibility for a small level of additional housing in the village. Armitage and Handsacre no current or projected surplus capacity in schools. Hayes Meadow Primary may offer some flexibility for expansion. Fazeley school has no current or projected surplus capacity. Possible to expand Mile Oak school by 1FE. Additional housing in Fazeley is likely to trigger the need for additional primary school capacity and developers would be required to make appropriate necessary contributions towards this. Shenstone has no current or projected surplus capacity. It is possible for the school to expand by 1/2 form. Additional housing in the village would trigger the need for expansion. Whittington has no current or project surplus capacity. The school could not be expanded within securing additional land adjacent to the current site.</p> <p>Secondary Education Fradley, Shenstone and Whittington are served by three Lichfield schools. Growth across these villages would necessitate need for a fourth secondary school. Alrewas is in the catchment of John Taylor in Barton. A new secondary school in Burton will open in 2018 and based on housing proposed in ESBC local plan additional secondary school places are needed by September 2022. Additional growth in Alrewas will necessitate additional secondary school places to be provided. Armitage and Handsacre potential limit scope for expansion in the future and any additional housing beyond that already proposed may be extremely difficult to mitigate. Fradley within the catchment for Rawlett School. There may be potential to increase secondary school provision on this site through new build with appropriate education contributions from developers.</p> <p>Generally development across a number of key rural villages would not be the preferred option from an education perspective. Mitigation at secondary schools may not be possible as many of the children in these villages are entitled to free home to school transport so there would be additional implications in terms of transport costs to the public purse, logistics and highway constraints around school sites.</p>	Comments noted. Lichfield District Council will continue to work with Staffordshire County Council throughout the progression of the Local Plan Review.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1364	Richborough Estates (Pegasus Neil Cox)	27	Dispersed Growth would be distributed across a wide range of settlements - considered those listed with identified settlement boundaries represent the most sustainable settlements within the District. Note consideration of smaller settlements and hamlets via Green Belt review updated evidence base. Green Belt review welcomed this approach should extend to all other Green Belt settlements listed under options 1 and 2. Option would meet housing need where they arise support village services and facilities in isolation this option would be least sustainable growth option. Combining other options with growth at some of the more sustainable smaller settlements may therefore be a more suitable strategy for the LPR.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1365	Richborough Estates (Pegasus Neil Cox)	28	New Settlement: Development would be focused in one or more new settlements. The Scope Issues and Options documents identifies a number of opportunities and challenges with this option. Richborough broadly agree but was considered previously by LDC in the LPS process and determined that the challenges outweighed opportunities. Delivery would require investment in infrastructure long lead in times 5-10 years uncertainty regarding market saturation not a considered appropriate solution in isolation. Likely result in failure to meet Housing delivery test in emerging NPPF - 95% delivery rate over a three year period. Range of sites spread across the District would provide greater resilience in supply and ensure the new Housing Delivery Test is satisfied. Growth Option 3 would result in no growth being focused in sustainable rural settlements = locally derived housing need not being net within villages such as Whittington undermine existing services and facilities relied upon by residents within these key rural settlements and smaller villages and hamlets within their hinterland. In isolation this option would again undermine the ability for the local community in Whittington to deliver their vision a and objectives as set out in the made Whittington and Fisherwick NP.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1366	Richborough Estates (Pegasus Neil Cox)	30	New Settlement: Development would be focused in one or more new settlements. The Scope Issues and Options documents identifies a number of opportunities and challenges with this option. Richborough broadly agree but was considered previously by LDC in the LPS process and determined that the challenges outweighed opportunities. Delivery would require investment in infrastructure long lead in times 5-10 years uncertainty regarding market saturation not a considered appropriate solution in isolation. Likely result in failure to meet Housing delivery test in emerging NPPF - 95% delivery rate over a three year period. Range of sites spread across the District would provide greater resilience in supply and ensure the new Housing Delivery Test is satisfied. Growth Option 3 would result in no growth being focused in sustainable rural settlements = locally derived housing need not being net within villages such as Whittington undermine existing services and facilities relied upon by residents within these key rural settlements and smaller villages and hamlets within their hinterland. In isolation this option would again undermine the ability for the local community in Whittington to deliver their vision a and objectives as set out in the made Whittington and Fisherwick NP.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1367	Czero Developments (Pegasus Liz Boden)	1	A 16 year timeframe is considered appropriate and in line with the guidance contained in the National Planning Policy Framework (NPPF) at paragraph 157 and NPPF 'Draft text for consultation. In addition, the plan period to 2036 would tie in with the Great Birmingham HMA Strategic Growth Study, published in February 2018, which considers the housing need, supply and shortfall across this wider area to the same timeframe of 2036.	Comments noted

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1368	Czero Developments (Pegasus Liz Boden)	2	<p>Green Belt Review: In light of the Local Plan Review having committed to consider the housing unmet needs of the Greater Birmingham and Black Country HMA it is considered that the Green Belt Review is a key piece of evidence which requires updating to take account of these strategic needs, serving a much wider area than just the local housing needs of Lichfield District. Furthermore, the Lichfield Local Plan Review should consider the removal of land from the Green Belt and alterations to Green Belt boundaries in line with the guidance of both the current and Draft NPPF at paragraph 135, through a further strategic Green Belt study. The Local Plan Allocations Supplementary Green Belt Report of 2016 assessed a number of parcels of land around Lichfield and Burntwood, as well as around the Key Rural Settlements and identified a number of smaller sites recommended to be considered to be removed from the Green Belt to assist in meeting the strategic housing requirements of the adopted Local Plan Strategy (LPS) in line with the adopted spatial strategy for the District. It is therefore contended that the removal of these sites, and others, should be given consideration through a further piece of evidence on Green Belt to underpin and justify subsequent policies and allocations made within the Review document. It is noted that paragraph 1.30 of the Scope, Issues & Options consultation document anticipates that a further local Green Belt Review document will be required and that this is also referred to in Appendix A which details the Local Plan Evidence base. Housing: a refreshed SHMA should be prepared in line with these latest projections. It should be noted, however, that the 2016 based vintage of population and household projection data will be published in the Summer of 2018. Once this is available it is important that this is used as the baseline upon which future housing growth is identified. Based on the 2014 based household projections, the total number of households anticipated to emerge in Lichfield between 2016 and 2026 is 275 household per annum. The 2016 affordability ratio for Lichfield District is 8, which then translates into an uplift of 24%, which is a further 65 dwellings. Together the dwelling requirement is, therefore, 340 homes per annum. It is worth noting, however, that the 2017 affordability ratio data has been published, which is now 8.5 for the District. This translates into an uplift of 78 dwellings. Therefore, application of this increased uplift would result in a total dwelling requirement of 353 dwellings per annum. As set out above, this is likely to change upon the publication of the 2016 based population and household projections are published later this year. When comparing the figures arrived at by the SHMA process (410 dwellings per annum) and the Standard Methodology (353 dwellings per annum), it is clear that the figures produced by the new methodology arrive at a lower figure. The reason for this is, in part, due to the earlier household projections. The SHMA identified a number of scenarios considering different factors such as migration, varying population projections, past development rates, static job growth and other factors and concluded that a dwelling requirement of 410 to 450 was appropriate. As highlighted above, the Standard Methodology only considers the latest population projections with no variation and the affordability ratio. The Standard Methodology therefore takes no account of those factors previously considered, as well as testing any future job growth projections (which was not previously undertaken) to ensure that the housing requirement is aligned to economic aspirations. In light of the above, it is recommended that further sensitivity testing of the Standard Methodology is undertaken to ensure the identified dwelling requirement Lichfield District Council Local Plan Review Scope, Issues & Options Consultation Representations by Pegasus Group on behalf of Czero Developments Ltd is robust and appropriate for the Plan period to 2036. In particular, the local planning authority should work with the Local Enterprise Partnership to quantify the level of growth that the District is aiming to achieve and understand the implications in respect of housing growth and meet cross boundary needs of the GBHMA through the Duty to Cooperate. Affordable Housing and Self Build housing. Rural Settlement Sustainability Study (RSSS) requires updating. Cannock Chase SAC -some of the empirical evidence is now out of date and a review is supported. Infrastructure- Draft Integrated Transport Strategy will particularly need updating to take account of recent housing and employment development in Lichfield City and Burntwood. Other pieces of evidence relating to infrastructure which are considered to now be out of date and in need of updating include those studies relating to indoor sports and recreation, playing pitches, health and well-being, air quality, biodiversity, renewable and low-carbon energy and water resources and supply. The evidence base does not encompass an overall Local Plan Viability Assessment, to test the Plan policies and sites.</p>	Comments noted, consideration of a Green Belt Review will be undertaken
SIO1369	Czero Developments (Pegasus Liz Boden)	3	<p>With regard to meeting the unmet needs of the Greater Birmingham and Black Country Housing Market Area (HMA) the Council has stated its commitment to engaging with its neighbours under the Duty to Co-operate and this should also encompass consideration of Tamworth's housing needs. In addition, concerns remain about how the housing shortfall will be addressed across the HMA, particularly with regard to ensuring that wider housing needs are met in a timely manner. Lichfield's overall housing figure for the Local Plan Review, given its proximity to neighbouring authorities that cannot accommodate their housing needs, should be reflective of strategic cross boundary housing needs and be a higher number than that set out in the DCLG standard methodology.</p>	Comments noted
SIO1370	Czero Developments (Pegasus Liz Boden)	4	<p>Agreed that the policies listed in Table 1.2 will require either significantly amending or replacing, as most of these policies are connected with implementing the current spatial strategy for the District.</p>	Comments noted
SIO1371	Czero Developments (Pegasus Liz Boden)	5	<p>Agreed that the policies in Table 1.3 require minor amendments, it is considered that there are several others which also require minor amendments to either bring them into line with current national policy or update them in the light of further evidence. This includes Core Policy 8 (Our Centres) which will need to be updated in light of recent development for retail, leisure, office and cultural facilities that has occurred within the commercial centres of Burntwood and Lichfield City and in other settlements, and this may necessitate changes to the Hierarchy of Centres.</p>	<p>The revised NPPF will need to be considered through the Local Plan Review process</p> <p>Comments noted, policy CP 8 will be considered through the Review.</p>

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1372	Czero Developments (Pegasus Liz Boden)	6	<p>Policy Burntwood 5: East of Burntwood is now considered to be out of date as the development is almost built out and Appendix F East of Burntwood Bypass SDA Concept Statement is therefore no longer required within the Local Plan Review document. Policy North of Tamworth may require amendment through the review process. This policy indicates a Broad Development Location for around 1,000 homes located around Arkall Farm. However, the planning consent for up to 1,000 dwellings and associated facilities at this location (application ref: 14/00516/OUTMEI) contains a number of triggers that place doubt on the level of homes likely to be delivered in this location to 2036.</p> <p>Policy East of Rugeley identifies a location for a mixed-use development of approximately 1,130 dwellings, in line with the concept statement at Appendix G of the Local Plan: Strategy. However, it is noted that the SDA encompasses the Borrow Pit and under Policy R1: East of Rugeley Housing Land Allocations set out in the Local Plan Allocations Focused Changes document, the Borrow Pit is to be retained as landscape/water feature within the wider allocated housing site, and therefore will no longer deliver the 450 dwellings (approximately) within the plan period as previously anticipated. In light of this, it is considered that Policy East of Rugeley is now out-of-date and requires amending accordingly.</p>	<p>The Arkall Farm Inquiry resulted in outline permission being granted.</p> <p>Comments noted, the location of new growth will need to be considered during the Review</p>
SIO1373	Czero Developments (Pegasus Liz Boden)	7	<p>A trigger for a further review of the Local Plan should be incorporated. The NPPF advises that Local Plans can be reviewed in whole or in part to respond flexibly to changing circumstances and the Draft NPPF advises that policies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. In the interest of maintaining a continuous supply of housing to meet identified needs it is considered that reserve sites should be identified within the Local Plan Review. Consideration also needs to be given to Safeguarded Land, in order that Green Belt sites on the edge of settlements may be able to be brought forward for development in the longer term, should the need arise. Both the current and the Draft NPPF state that where necessary, areas of safeguarded land between the urban area and the Green Belt should be identified in Local Plans, in order to meet longer-term development needs stretching well beyond the plan period.</p>	<p>A review trigger would only be necessary were there something specific that might trigger a review ahead of the NPPF 5 year review timetable</p> <p>The need for safeguarding land would need to be established in the Review. However it is currently considered to produce a Plan that does not necessitate the need for safeguarding</p>
SIO1374	Czero Developments (Pegasus Liz Boden)	8	<p>The list of issues in Table 3.1 reads more as a set of objectives, with only numbers 2, 3 and 9 setting out issues to be addressed.</p>	<p>Comments noted a review of the objectives and there delivery will be undertaken</p>
SIO1375	Czero Developments (Pegasus Liz Boden)	10	<p>The majority of the Strategic Priorities are considered to remain broadly relevant for the Local Plan Review, Strategic Priority 6 'Meeting Housing Needs' refers only to meeting the needs of the residents of Lichfield District. It is considered that this should be amended to also refer to meeting the unmet housing needs of the wider Birmingham and the Black Country Housing Market Area, which includes Lichfield District, and is identified as Issue 1 within the consultation document and referred to under the previous response to Question 2 of this consultation document.</p>	<p>The Review does include reference to the GBHMA shortfall. However it is recognised that the Plan Review will need to deal with cross boundary issues</p>
SIO1376	Czero Developments (Pegasus Liz Boden)	9	<p>The vision and approach set out in the Local Plan remains relevant and is supported. However, it is also considered that the vision could be more ambitious as reference could be made to the opportunities presented to the District by its role within the wider West Midlands region, with projects such as HS2 and the Commonwealth Games due to come to fruition within the period covered by this Local Plan Review.</p>	<p>Comments noted sub-regional, regional and national initiatives will need to be assessed to identify whether there is scope to incorporate within the vision</p>
SIO1377	Czero Developments (Pegasus Liz Boden)	11	<p>Lichfield District is very diverse in terms of housing density across the District it is therefore considered that if density standards are incorporated within the Local Plan Review, then these should be minimum standards determined by reference to the character of the local area and the housing mix as determined by local needs. In accordance with emerging national guidance the Council may wish to consider a variety of density standards for different locations.</p>	<p>Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.</p>
SIO1378	Czero Developments (Pegasus Liz Boden)	12	<p>It is considered that Lichfield District Council should assist in meeting these unmet housing needs through identifying additional land for development in sustainable locations and in making best use of existing infrastructure in sustainable locations with strong links to the conurbation. This may require a spatial development strategy that maximises growth options in a range of settlements and locations to boost significantly the delivery of new homes. In assisting with meeting these needs the Council should also give consideration to potential benefits that could be delivered for the District, such as unlocking Government funding for growth and aligning future development with their economic aspirations in delivering the Council's and the LEP objectives.</p>	<p>Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy and quantum for growth. This will be informed by a range of evidence.</p>

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1379	Czero Developments (Pegasus Liz Boden)	13	<p>A key priority of the Government is to boost the supply of housing by a variety of means to meet the varied housing needs of people across the UK. Self-build and custom housebuilding has been identified as a significant element of the Government's agenda to increase housing supply. The NPPF and the new draft NPPF both give explicit support to policies which would plan for a mix of housing based on the needs of different groups in the community, including people wishing to commission or build their own homes. In addition, paragraph 159 of the NPPF sets out that Local Planning Authorities (LPA's) have a duty to assess the local demand for self-build plots and must also make provision for that demand. With regard to facilitating the provision of self-build and custom build housing within Lichfield District the identification of specific sites for such development is favoured, as this option would have a greater chance of ensuring that the needs of people wishing to build their own homes are met. Attached as Appendix 2 are several considerations which it is recommended should be taken into account by the LPA in drawing up a policy on self-build and custom build housing. This specifically refers to research by our clients CZero Developments Ltd which indicates that sites of 5-15 dwellings are the ideal size for this type of development, and that current demand for Custom build is for low density sites accommodating detached houses or bungalows of 3 to 5 bedrooms. It is therefore recommended that sites which can meet these requirements are specifically allocated within the Local Plan Review document as self-build/custom build housing sites. With regard to the option of requiring certain developments to provide a proportion of their site as serviced plots for custom build development, both our clients and NaCSBA (the recognised national body for the Custom Build Industry) do not consider that this mechanism works in practice, and that the demand for custom build in Lichfield District would not be met. It is generally the case that the larger housing sites favoured by the volume housebuilders do not offer the type of location and plots that most Custom Builders seek. Added to this there is no incentive for the housebuilder to provide such plots. It is very likely, given the preference of Custom Builders, that even if large housebuilder sites were to offer serviced plots, these would not satisfy the market, would eventually revert back to standard housing, and the custom build need of the area would not be met.</p>	Comments noted. This will be considered further as the Local Plan Review progresses and will be informed by a range of evidence.
SIO1380	Czero Developments (Pegasus Liz Boden)	14	<p>Other options used by LPA's include undertaking a strategic review of land within their ownership to identify smaller plots and proactively identify sites and establish if they are suitable for self and custom build. Planning briefs could be prepared for suitable sites to provide some certainty for prospective buyers. However, it is recognised that this approach is not always suitable, as many LPAs do not have large land-holdings and there are often issues of resourcing and financial liabilities to be resolved for such an approach to work.</p>	Comments noted. This will be considered further as the Local Plan Review progresses and will be informed by a range of evidence.
SIO1381	Staffordshire County Council	26	<p>It is considered that this is not an appropriate option for growth and should not be progressed. The plan correctly identifies the challenges and as such it is considered unsustainable creating longer and more car reliant journeys for work, leisure and education purposes.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1382	Staffordshire County Council	27	<p>Housing growth in rural settlements may increase the quantum of residents entitled to free home to school transport. Spreading growth further across a greater number of village settlements will exacerbate the issue and create further logistical complexities. Care will be needed to ensure separation and perceived separation between settlements is maintained if settlements in close proximity are expanded.</p>	Comments noted. Lichfield District Council will continue to work with Staffordshire County Council throughout the progression of the Local Plan Review.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1383	Staffordshire County Council	28	<p>Agreed a new settlement is a viable option to consider for growth. It is difficult to comment in detail until scale of growth is known.</p> <p>The infrastructure and services required will overtime fall within the confines of the settlement itself. It will be important to ensure the size of the settlement supports the infrastructure required.</p> <p>From education perspective the key factor would be the ability for the development to provide necessary primary and secondary school infrastructure within the site. A new high school would need to be minimum of 5 FE and more preferably 7/8 FE. A minimum of 5,000 dwellings would be needed to make a new secondary school viable.</p> <p>From a transport perspective all proposals are reasonably close to existing major urban areas and strategic local / national road networks. Proposals for Fradley and Shenstone have potential rail access. There are highway constraints North of Tamworth BDL. The proposed settlement at Thorpe Constantine is likely to feed traffic into this area so will require special consideration.</p> <p>Landscape perspective the location of a new settlement should be informed by a Landscape Sensitivity Assessment. It should identify sensitive landscapes where development should be avoided or conversely where it can be absorbed. Assessment should refer to local Landscape Character Assessment and emerging update to that assessment.</p> <p>Fradley / Alrewas - HS2 will impact on the area and potential to benefit from new woodland planting to help assimilate a new settlement into this changing landscape.</p> <p>Shenstone - located within Green Belt. The GB review will need to ensure the remaining green belt can still function. A new settlement would potentially create an island of development and waken the openness and function of the remaining green belt.</p> <p>Thorpe Constantia - identified as a landscape at risk</p> <p>Ecology perspective an on-site Preliminary Ecological Appraisal should inform any decision.</p> <p>Fradley / Alrewas - known ecological constraints include open water habitats and woodland.</p> <p>Shenstone - known ecological constraints include Crane Brook / Black brook corridors and several small woodlands.</p> <p>Thorpe Constantine - little ecological data for this area.</p>	Comments noted. Lichfield District Council will continue to work with Staffordshire County Council throughout the progression of the Local Plan Review.
SIO1384	Czero Developments (Pegasus Liz Boden)	17	Lichfield Centres Study was published in 2017 and is therefore fairly recent. However, to inform the Local Plan Review, which will span the period from 2020 to 2036, it should be updated following the completion of the Friarsgate and other Lichfield City Centre schemes, and the impact of the Mill Green Designer Outlet Village (Cannock Chase District). In addition, the distribution of housing growth needs first to be determined before future household expenditure can be estimated and floor space requirements determined.	Comments noted. This will be considered further as the Local Plan Review progresses.
SIO1385	Czero Developments (Pegasus Liz Boden)	18	Supporting Development Plan Documents for Lichfield City Centre and Burntwood Town Centre is not favoured, as a single comprehensive Local Plan is the preferred option, this would minimise resource and improve consistency and clarity to the local community, the development industry and investors. Local planning related matters can be considered through Neighbourhood Plans that, once 'made', can form an element of the development plan. The Whittington and Fisherwick Neighbourhood Plan now forms part of the development plan for the District and provides locally specific policies that negates the need any additional DPDs to cover Whittington. It is noted that the Local Plan Review may result in inconsistencies between District level policies and those set out in the neighbourhood plan; this will be the case if an increased level of residential development is focused to Whittington.	Comments noted. The revised NPPF is due to be published summer 2018 and set out that Local Plan should be reviewed every 5 years.
SIO1386	Czero Developments (Pegasus Liz Boden)	19	The Local Plan Review offers scope to encompass a wide range of development and as well as housing, employment and retail development should include policies and strategic allocations necessary to provide appropriate leisure, recreation, infrastructure and community facilities.	Comments noted. Infrastructure provision will be considered as part of the testing of each option.
SIO1387	Czero Developments (Pegasus Liz Boden)	20	An update to the Infrastructure Development Plan (IDP) will be used to inform the new development strategy for the District, it is the case that the levels of housing, employment and retail growth should be determined first, in order that the types of infrastructure required can then be established.	Comments noted. The District Council is committed to working with strategy providers, developers and other service providers to enable the sustainable development within the District.
SIO1388	Czero Developments (Pegasus Liz Boden)	21	Focusing the majority of growth within and around the major settlements within and adjacent to Lichfield District would bring forward certain benefits, such as re-using brownfield land within urban areas, utilising infrastructure that is already in place, supporting existing services and facilities, and building to higher densities where appropriate. This option would also allow for urban extensions to settlements just outside of the District's boundary, and would therefore be able to assist in meeting cross-boundary housing needs such as those of Birmingham, the Black Country and Tamworth, incorporating elements of the options set out in the Greater Birmingham HMA Strategic Growth Study. However, this option may mean that other smaller sustainable settlements and rural areas experience a decline in population, with subsequent adverse impacts on levels of services and facilities. Additionally, town focused growth may lead to increasing pressure on services and facilities within those settlements and consideration should therefore be given to the release of Green Belt sites on the edge of these settlements to provide long-term options for housing and employment growth which will assist in alleviating pressures within existing urban areas.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1389	Czero Developments (Pegasus Liz Boden)	22	This option would have the advantage of being able to meet housing needs close to where they arise and also has the potential to deliver a wide range of housing types and tenures, as well opportunities to deliver green infrastructure and community and sporting facilities, through the creation of sustainable urban extensions.	Comments noted.
SIO1390	Czero Developments (Pegasus Liz Boden)	23	This option represents a continuation of the spatial strategy for the District set out in the existing Local Plan adopted in February 2015. This option would focus the majority of growth at the main urban areas, but at a slightly reduced level to that proposed in Option 1, allowing for modest growth at some of the Key Rural Settlements. This is considered to be an appropriate option for delivering housing growth across the District to 2036, as it would allow a greater range of sustainable sites to come forward and would therefore increase housing choice for new and existing residents.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1391	Czero Developments (Pegasus Liz Boden)	24	Settlements are entirely suitable to remain as Key Rural Settlements, given that they all exhibit good levels of services and facilities, as well as accessibility to services in higher order settlements. There is an opportunity to update the Rural Settlement Sustainability Study (RSSS) which provided the evidence base. Whittington is one of only handful of sustainable villages within the District and is recognised as a highly sustainable location for development, serving not only local residents by those in outlier villages. Czero Developments Ltd consider that the distribution of development under this option should be proportionate to the sustainability credentials of each settlement. Therefore, under this option Whittington should continue its role as a focus for sustainable rural growth to 2036 and beyond. This village should retain its classification as a Key Rural Settlement as it has a good level of services and facilities, as well as good connections via bus services to both larger settlements of Lichfield and Tamworth. Retaining Whittington as a Key Rural Settlement under this Option would afford the opportunity to examine the options for meeting housing requirements at Whittington and allocate sites for housing development through the Local Plan Review at this sustainable settlement, to assist in meeting the housing needs of both a Lichfield and Tamworth Districts. At present under Policy Whit4: Whittington Housing of the adopted Local Plan Strategy a range of between 35 and 110 homes is apportioned to Whittington. This is considered too low and it is considered that this previous Regulation 19 Allocations document would have implemented and allocated housing sites much more in line with the adopted spatial strategy for the District, giving greater flexibility for to meet housing demand.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1392	Staffordshire County Council	29	It is assumed that the Fradley/Alrewas location includes both the Brookhay/Twin Rivers and Watery Lane proposals that have been promoted previously?	The locations shown within the Scope, Issues & Options document are indicative and do not represent specific sites/proposals at this stage.
SIO1393	Czero Developments (Pegasus Liz Boden)	25	This option would provide a very wide range of housing choice in a number of sustainable locations, and have the opportunity of providing dwellings in locations which accord with some of the recommendations in the Birmingham Strategic Growth Study. Distributing housing to these settlements would assist in maintaining their services and facilities and also those of other settlements which residents of these settlements access. The challenges highlighted for this option include reference to potential development sites being more likely to be greenfield and that changes to Green Belt boundaries may be required. The Local Plan Review affords the opportunity to re-examine settlement and Green Belt boundaries and allocate sites beyond such boundaries such as and the land west of Common Lane, Whittington, as a housing allocation. It is contended that this site is suitable, deliverable and achievable for the development of 10 custom-build dwellings and details of our client's proposals for the site are set out in a Whittington Site Proposal Document, attached as Appendix 5. Indeed, it is noted that the Council's latest SHLAA, published in July 2017, includes an assessment of the site (ID: 1035) as available, achievable and deliverable.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1394	Staffordshire County Council	30	Important to consider the interim infrastructure needs of new residents as the development builds out. In the fullness of time the settlement should be self-sustaining but in early years residents may have to rely on infrastructure off site until on site provision is viable. It will be necessary to balance place making with early delivery of on-site infrastructure to ensure there are no adverse effects and the most cost effective solutions.	Comments noted. Lichfield District Council will continue to work with Staffordshire County Council throughout the progression of the Local Plan Review.
SIO1395	Czero Developments (Pegasus Liz Boden)	26	The settlements listed with identified settlement boundaries represent the most sustainable settlements within the District. It is noted that the consultation document refers to consideration being undertaken to other smaller settlements and hamlets through a comprehensive Green Belt Review as part of the updated evidence base. Whilst a comprehensive Green Belt Review is welcomed, it is contended that as a matter of course this approach should extend to all other Green Belt settlements listed under Options 1 and 2.	Comments noted. A comprehensive Green Belt Review will be progressed as part of the evidence base supporting the Local Plan Review process.
SIO1396	Czero Developments (Pegasus Liz Boden)	27	Although this option would have the advantage of meeting housing needs where they arise and support village services and facilities, in isolation this option would represent the least sustainable option for growth. Combining other options with growth at some of the more sustainable smaller settlements may therefore be a more suitable spatial strategy for the District moving forwards through the Local Plan Review process (see response to Question 37 set out below).	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1397	Staffordshire County Council	31	Focusing employment growth at existing employment areas seems viable. However a large proportion of previously consented employment land at Fradley now forms part of the residential land requirement. Expansion of employment at Fradley - any expansion should demonstrate excellent approach to ecological issues including protection / expansion of woodland and protected species populations.	Any employment development at Fradley will have regard to the Biodiversity Strategy.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1398	Czero Developments (Pegasus Liz Boden)	28 & 30	Under this growth option, development would be focused to one or more new settlements, with only a small amount of growth being focused to the key urban settlements. The Scope, Issues and Options document identifies a number of opportunities and challenges associated with this option which CZero Developments Ltd broadly concurs with. However, the option of a new settlement was considered previously by the District Council in developing the current Local Plan Strategy and determined that the challenges outweighed the opportunities. The delivery of a new settlement would require significant investment in new infrastructure and due to long lead in times of a minimum of 5-10 years and uncertainty regarding delivery due to market saturation, this should not be considered as an appropriate solution for meeting the District's housing requirement in isolation. As with Residential Growth Option 3, this option would result in no growth being focused to sustainable rural settlements which would result in locally derived housing needs not being met within the villages such as Whittington and would undermine existing services and facilities relied upon by residents within these key rural settlements and smaller villages and hamlets within their hinterland. In isolation, this option would again undermine the ability for the local community in Whittington to deliver their Vision and Objectives as set out in the emerging Whittington and Fisherwick Neighbourhood Plan.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. The Scope, Issues and Options document recognises the self-build agenda.
SIO1399	Czero Developments (Pegasus Liz Boden)	37	The spatial strategy needs to be consistent with the vision for the District and the strategic priorities needed to implement the vision. In retaining the vision and approach set out in the Local Plan it therefore follows that the spatial strategy encompassed within the Local Plan Review should focus growth on the town centres and key settlements within the District. Additionally, the strategy should encompass provision for cross boundary needs, and added to those of Rugeley and Tamworth consideration should be given to the needs of the Greater Birmingham Housing Market Area, which may result in other strategic locations being identified. Furthermore, some further development in the higher order smaller settlements should be identified and it is considered that the preferred option should therefore be a combination of Options 1 and 2, as well as including some elements of Option 3.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. The Scope, Issues and Options document recognises the self-build agenda.
SIO1400	Czero Developments (Pegasus Liz Boden)	38	The proposed IDP structure reflects that of the current Lichfield District Council IDP, and in again setting out the infrastructure requirement, the cost, funding, phasing and delivery lead, this should enable the effective articulation of infrastructure requirements associated with the Local Plan.	Comments noted: Delivery Leads and funding streams will be identified as they become apparent.
SIO1401	Czero Developments (Pegasus Liz Boden)	39	The Council proposes to prioritise infrastructure into Critical/Essential or Important. Neither the current NPPF, nor the Draft the NPPF advocates this approach and it is considered that it is not the role of the IDP to prioritise the delivery of infrastructure or what funds should be allocated to the delivery of that infrastructure, as these decisions will be informed by other processes, investment plans and strategies. What is key is that the Council actively engages with infrastructure providers at an early stage to ensure that the required infrastructure is delivered in a timely manner to allow development sites to come forward. Additionally, the IDP is a 'living' document which is subject to ongoing change and revision, therefore what is considered to be a critical piece of infrastructure at one time may change, particularly if some developments do not come forward in the timescales predicted in the Local Plan. There therefore needs to be an element of flexibility within the IDP and it is considered that prioritising infrastructure in this way would not assist in this.	Whilst it is noted that prioritisation is not a requirements the District Council operates a CIL charge, prioritisation within the IDP will enable the informed distribution of funds and the development of a programme of needs across the plan period enabling a process that supports delivery of appropriate requirements which address evidenced need. As the IDP is reviewed the status of project prioritisation will also be revisited.
SIO1402	Czero Developments (Pegasus Liz Boden)	40	As set out in response to Question 39, the prioritisation of infrastructure is not considered to be the role of the IDP and thus the identified prioritisation categories and their definition is not considered relevant.	Whilst it is noted that prioritisation is not a requirements the District Council operates a CIL charge, prioritisation within the IDP will enable the informed distribution of funds and the development of a programme of needs across the plan period enabling a process that supports delivery of appropriate requirements which address evidenced need. As the IDP is reviewed the status of project prioritisation will also be revisited.
SIO1403	Czero Developments (Pegasus Liz Boden)	41	Under Question 2 it has been noted that several pieces of evidence need updating and these comments are also relevant in response to this question	Comments noted
SIO1404	Czero Developments (Pegasus Liz Boden)	43	The Council has set out a proposed stakeholder engagement process which identifies a set of actions through which focused engagement can be undertaken. It is considered that this process should result in the identification of infrastructure requirements and enable the delivery of those requirements.	Comments noted
SIO1405	Staffordshire County Council	34	The locations identified have been informed by available land put forward and assessed through the Employment Land Availability Assessment (ELAA) and are considered to be reasonable locations for consideration under this option	Comments noted.
SIO1406	Staffordshire County Council	35	Depending on the housing taken forward there may be potential to include an employment element in the New Settlement Option. The Strategic Growth Study includes within its considerations Employment-led strategic development of 1,500-7,500 dwellings, which fits around the content of the consultation document that suggests the 10,000+ dwellings for a new settlement may not be achieved in the locations proposed in the options.	Comments noted.
SIO1407	Staffordshire County Council	37	Employment employment-led strategic development may be an option to consider separately or in combination with the existing rather than focussing on two distinct strategies for housing and employment land separately.	Comments noted.
SIO1408	Staffordshire County Council	38	It is agreed that the proposed IDP structure will enable the effective articulation of infrastructure requirements. We already have good structures in place with the District Council to consider and plan for infrastructure.	Comments noted

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1409	Staffordshire County Council	39	The prioritisation of infrastructure will be a useful tool to enable delivery. However, it will be essential for there to be agreement over which projects are placed in the relevant categories.	Comments noted: Agree the assessment of identified categories will require the support of a robust assessment framework.
SIO1410	Staffordshire County Council	40	Assumed the question is aimed at gathering feedback on the proposed categories. On that basis I there seems to be little differentiation between Critical and Essential. Both imply that development is unacceptable without the project. Further clarification is required or consideration of combining the two to avoid potential difficulties in assigning projects to categories at a later stage in the plan making process	Comments noted: Agree the assessment of identified categories will require the support of a robust assessment framework which will ensure that there is clarity surrounding categories.
SIO1411	Staffordshire County Council	41	Evidence base needs to be expanded to cover Education infrastructure, given the issues identified through this response in order to provide for the development of an IDP. The evidence base contains no reference to utilities.	Comments noted
SIO1412	Staffordshire County Council	42	Yes the following are currently available: Yes, the following are currently available - SUDS Handbook; Staffordshire Learning Infrastructure Framework; and Next Generation Care Project;	Comments noted
SIO1413	Drayton Manor Park (Pegasus Liz Boden)	Whole Document	No policy provision for Drayton Manor Park. These Representations are accompanied by an Economic Benefits Report - June 2018 (contained at Appendix 1), which assesses the economic benefits associated with the current activities at Drayton Manor Park, as well as the economic benefits that could be generated through the Park's future development proposals. The Representations are also accompanied by a Vision Document - June 2018 (contained at Appendix 2) which provides an overview of the long-term development strategy and vision for the Park and Landscape and Visual Statement - May 2017 (contained at Appendix 3) also accompanies these representations and presents a high-level appraisal of the site in respect of baseline matters of landscape character and visual amenity, and the nature of the existing Green Belt in this location, with assessment of the site against the purposes of including land within the Green Belt and the capacity for future development within the landscape setting. In order to secure the long-term future of Drayton Manor Park it is important that the Park can invest in new rides and attractions to meet the continually evolving needs of the market place and ensure that it stays competitive. As such, over the next 15 years, the Park plans to upgrade existing facilities, invest significantly in delivering new facilities and attractions, increase visitor capacity and expand the accommodation offer provided on-site, in order to attract more visitors and over-night stays. Within Drayton Manor Park's ownership boundary, several development proposals are envisaged within the next 10 years, including an expansion to the theme park; a refit of the zoo; an indoor water play 'Splash Zone'; woodland activity centre; new offices; expansion to the hotel and conference facilities; expansion of the lodge park; and expansion of the caravan and camping site. Potential expansion of the developable area of Drayton Manor Park is also envisaged in the long term (10+ years).	Policy Faz3 in the Strategy local plan is considered to support this site. The policy will be reviewed using evidence in the Employment Land Review as stated in Appendix B.
SIO1414	Staffordshire County Council	43	Yes	Comments noted
SIO1415	Drayton Manor Park (Pegasus Liz Boden)	2	The current Employment Land Review will need updating to extend to the new plan period ending in 2036. The economy of Lichfield has grown considerably in recent years. Lichfield saw total employment increase by 8,000 between 2009 and 2015, equating to annual growth of 3.0%. This was substantially higher than the annual growth rates seen in the West Midlands and Great Britain of 0.8% and 1.0% respectively. Along with Solihull, Lichfield was the fastest growing local authority in the West Midlands in terms of employment from 2009-15. More recent data for 2015-16 suggests this strong growth is continuing, with Lichfield seeing 4.1% job growth (2,000) between 2015 and 2016. Total jobs in the District now stand at around 51,000. The 2012 ELR included forecasts of employment trends in Lichfield. The base year for all forecasts was 2009. Based on a review of the 2014 ELR update, it appears that the same forecasts were used, with the main difference being that they were extended to reflect a different timeframe. Given jobs data is now available up to 2016, a full ELR will need to look at a completely new set of forecasts to gain an up to date picture of future jobs growth in Lichfield. If any update simply uses the forecasts from the 2012/2014 reports, there is a significant risk of under estimating employment change and the subsequent land requirements. At least two sets of forecasts are required. Firstly, a baseline review of what jobs growth will look like if past trends continue and secondly and, a 'policy-on' scenario which reflects economic aspirations in Lichfield and the wider West Midlands region. The policy on scenario needs to include the potential impact of Drayton Manor Park expanding and the resulting jobs growth this will generate. Research should be undertaken on the major employers in Lichfield and identifies their future growth plans. Drayton Manor Park is a key employer within the District with continued plans to grow and develop. Green Belt and an assessment of Drayton Manor Park should be included, the site is located within an area that provides a limited contribution to the purposes of the Green Belt and concludes that there are no overriding landscape and visual reasons why new development at Drayton Manor Park could not be assimilated into the landscape, taking into account the influence that the existing land uses in the area already have on the local landscape character. There is clear justification for Drayton Manor Park to be clearly identified/allocated as an existing employment site, as well as key tourist attraction within the Local Plan Review document.	Comments noted. The Local Plan Review will be supported by a range of evidence, including evidence relating to employment/commercial growth.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1416	Drayton Manor Park (Pegasus Liz Boden)	4	The policies listed in Table 1.2 will require either significantly amending or replacing, as most of these policies are connected with implementing the spatial strategy for the District. The adopted Local Plan Strategy acknowledges the importance of Drayton Manor Park to the local economy and gives broad support to the Park as a major tourist attraction. However, the lack of inclusion of Drayton Manor Park within the Local Plan Review: Scope, Issues and Options document would, as currently proposed, leave Drayton Manor Park open to the full weight of Green Belt policy, this would increase the risk involved with investment in future development proposals at the Park which in turn may have significant detrimental impacts to the local economy. Given the economic and employment benefits of Drayton Manor Park, and the potential economic and employment growth associated with the Park's long term development proposals and could impact the effectiveness of the overall Local Plan in delivering its economic objectives over the Plan period, and as such could impact the soundness of the Local Plan Review document.	Drayton Manor Park and its policy footing has been requested by Pegasus to be heard at the Local Plan Allocations EIP. The conclusion of this will have a bearing upon the Review.
SIO1417	Drayton Manor Park (Pegasus Liz Boden)	5	Agreed that the policies in Table 1.3 require minor amendments, it is considered that there are several others which also require minor amendments to either bring them into line with current national policy or update them in the light of further evidence. Core Policy 9 given the theme park's significant contribution to the District as a major employer and key tourist attraction it is considered that greater policy support should be given for the site's future development. This is discussed further in response to Questions 4, 7 and 18.	Drayton Manor Park and its policy footing has been requested by Pegasus to be heard at the Local Plan Allocations EIP. The conclusion of this will have a bearing upon the Review.
SIO1418	Drayton Manor Park (Pegasus Liz Boden)	7	A new policy relating specifically to Drayton Manor Park. To provide specific policy guidance which would continue to protect the theme park from the full weight of Green Belt policy and ensure its sustainable growth and development as a key tourist attraction and employer within the District. By allocating land at Drayton Manor Park, this provides an opportunity for a Supplementary Planning Document (SPD) to be prepared (as discussed further in response to Question 18). Drayton Manor Park seeks a similar positive planning policy framework as has been implemented by Wyre Forest District Council and Staffordshire Moorlands District Council through a policy allocation within the emerging Local Plan Review. Similar to the following: "Within the allocation area of Drayton Manor Park (as shown in Figure X), development proposals that support and enhance the Park's operations as a leisure and tourism destination will be permitted. Lichfield District Council Local Plan Review. In considering development within the allocation area, proposals will be permitted providing that they do not have a greater impact on the openness of the Green Belt and the purposes of including land within it than existing development at the Park. A Supplementary Planning Document will be produced to guide the detailed plans for sustainable development of Drayton Manor Park."	Drayton Manor Park and its policy footing has been requested by Pegasus to be heard at the Local Plan Allocations EIP. The conclusion of this will have a bearing upon the Review.
SIO1419	Drayton Manor Park (Pegasus Liz Boden)	8	In relation to Drayton Manor Park and its future development proposals, there are additional issues that need to be considered. • How Lichfield District Council will support existing businesses in the District to grow: Issue 7 in the Scope, Issues and Options consultation document talks about making the area a desirable place for businesses to locate and invest. Whilst this is certainly supported, it is considered that far more needs to be done to translate this vision into reality. For Drayton Manor Park, this means developing a Supplementary Planning Document alongside greater policy support, to promote the sites future growth and development. Supporting key sectors in Lichfield: Tourism is one of the key sectors in Lichfield. Drayton Manor Park plays a critical role in supporting the growth of tourism in Lichfield, attracting 1.2million visitors per annum and generating £140million per annum in visitor spend. If the Park is able to expand its operations, it is estimated that visitor numbers increase to 1.5 million per year, generating just under £180 million per annum in visitor spend. The change in planning policy context as a result of the continued oversight of not including a policy allocation within the Local Plan Review document relating to Drayton Manor Park could therefore have significant detrimental economic impacts to the District and neighbouring Local Authority areas.	Drayton Manor Park and its policy footing has been requested by Pegasus to be heard at the Local Plan Allocations EIP. The conclusion of this will have a bearing upon the Review.
SIO1420	Drayton Manor Park (Pegasus Liz Boden)	18	Supplementary Planning Document (SPD) for Drayton Manor Park is supported alongside a specific policy allocation within the Local Plan Review document, ensuring the theme park's continued protection from the full effect of national and Development Plan Green Belt Policy currently afforded by saved policy EMP5 of the 1998 Local Plan. It is recognised that EMP5 is now out of step with national policy but nevertheless there is still a need to provide a secure policy framework for Drayton Manor Park. Drayton Manor Park have produced a long term development strategy for the Park, as summarised in the accompanying Vision Document contained at Appendix 2, and as such, there is a clear opportunity for a SPD to be prepared jointly between Drayton Manor Park and Lichfield District Council in relation to the future growth of the Park.	Comments noted. This will be considered further as the Local Plan progresses
SIO1421	Drayton Manor Park (Pegasus Liz Boden)	19	Specific policy support for Drayton Manor Park will be required within the Local Plan Review The document however fails to expand on how it will support the development of these attractions, in particular, Drayton Manor Park, to ensure its future contribution to the local economy. The plan does not include any policies and strategic allocations specifically relating to tourism, recreation or leisure which could severely impact investment in the Park's future development plans, affecting the long-term sustainable growth of the Park and in turn the sustainable growth of the District's economy and tourism, leisure and recreation offer.	Comments noted. The inclusion of new policies will be considered as the Local Plan Review progresses.
SIO1422	Richborough Estates KB (Pegasus NC)	Whole Document	Supports decision to review opportunity for comprehensive review of vision Strategic Objectives, development required, spatial strategy policies. In line with NPPF revise every five years. Proposed timescales in LDS will ensure up to date plan. Scope Issues and Options highlights number of key changes since adoption of LPS including GBHMA unmet need. Richborough support process make following comments.	Comments noted.
SIO1423	Richborough Estates KB (Pegasus NC)	1	Noted adoption anticipated 2020 plan period 2020-2036 = 16 year timeframe. Considered appropriate and in line with para 157 NPPF and stance of draft NPPF. Plan period will aligned with GBHMA SGS Feb 2018 which considers housing need - time frame 2036.	Comments noted

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1424	Richborough Estates KB (Pegasus NC)	2	<p>NPPF – based on adequate up to date and relevant evidence. Following evidence base studies require updating. Housing SSD Housing Needs Study and SHMA 2012 (six years ago) included LDC TBC and CCD report considered demographic housing economic trends date from 2012 based sub national household projections. More recent data 2014 available and it is considered that if national planning policy remains as drafted SHMA should be refreshed in line with latest projections. Also 2016 based data will be published in summer 2018 once available should be used as a baseline for future housing growth. Housing White Paper and Planning for the Right Homes in the Right Places proposed standard Methodology for dwellings requirements if in revised NPPF (July) appropriate to use standard approach. 2014 projections LDC 2016-2026 + 275 households per annum. 2016 affordability ratio 8 + uplift of 24% = further 65 dwellings. Total dwelling requirements 340 per annum. But 2017 affordability ratio 8.5 = 78 dwelling uplift = 353 dwelling per annum. Dwelling requirement likely to change once 2016 population household projection published later in year. Comparing SHMA 410 dwellings and Standard Methodology 353 dwellings clear figures by the new methodology are lower. Due to use of earlier household projections - SHMA identified number of scenarios concluded dwelling requirement of 410 and 450. Standard Methodology only considers latest population projections no affordability ratio, no account for many factor previously considered to ensure housing is aligned with economic aspirations. Recommend further testing of standard methodology to ensure dwelling requires robust to 2036. Work with LEPS understand economic growth and align housing. LDC falls under GBBCHMA acknowledged that some authorities are unable to meet need LDC play a role Duty to Corporate to help met shortfall. Lichfield close to Birmingham and BC and strong functional relationship between the conurbation and settlements in LDC suitable and sustainable locations for growth to assist issue. SS housing needs Study appraised affordable housing partial update in earlier SHMA prior to 2012 now out of date Dynamic model based on Affordable Housing Viability Assessment 2012 needs refreshing. Rural Settlement Sustainability Study (RSSS) published 2016 to inform LPA requires updating review is strategic. Review may result in amendments in hierarchy of settlements should recognise Kings Bromley includes a range of services since published COOP store ATM Café Pay point facility. Reassessment Kings Bromley uplift in settlement hierarchy in LPR. CCSAC review published in 2017 checked SAMMM still fit for purpose. Review concludes approach fit for current plan but some aspects should be focus of full review to a more comprehensive strategy in future - support and also evidence gathering to inform stage 2 of HRA. Also the following out of date Impact of Recreation to the CCSAC 2012 visitor impact mitigation strategy March 2010 Visitor Survey Feb 2013 review should inform amendments to Policy NR7 LPS 2015 that can be carried through into the LPR. Infrastructure IDP living Document number of evidence base studies require updating to assess emerging spatial options for LPR Draft Integrated transport Strategy 2011, indoor sports recreation playing pitches health and wellbeing air quality biodiversity renewable and low carbon energy water resources and supply. IDP should consider all settlements necessary infrastructure to grow. Viability Evidence base doesn't include Local Plan Viability Assessment Para 174 LSP should assess cumulative impacts. In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle", and that, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened".</p>	Comments noted. The Local Plan Review will be supported by a range of evidence, this will include evidence related to housing need.
SIO1425	Richborough Estates KB (Pegasus NC)	3	LDC Identify a number of issues to consider under Duty to Co-operate. Unmet housing needs of the GB HMA council commitment to engage including Tamworth Housing needs. Concerns how housing shortfall will be addressed across HMA in a timely manner. Standard Methodology for housing needs sets a minimum figure, does not consider other factors, LDC overall housing figure for LPR due to proximity of neighbours with unmet need should reflect strategic cross boundary housing needs = far higher number than Standard mythology. GL Hearn report identifies minimum shortfall of 60,855.	Comments noted
SIO1426	Richborough Estates KB (Pegasus NC)	4	Agree	Comments noted
SIO1427	Richborough Estates KB (Pegasus NC)	5	Agree with Table 1.3 but several other also require minor amendments to either bring them into line with current national policy or update them in the light of further evidence. Core Policy 8: Our Centres and may necessitate changes to the Hierarchy of centres.	The revised NPPF will need to be considered through the Local Plan Review process
SIO1428	Richborough Estates KB (Pegasus NC)	6	Policy Burntwood 5 is now considered to be out of date as the development is almost built out. Policy East of Rugeley is now out-of-date and requires amending accordingly. Policy North of Tamworth may require amendment through the review process as this plan approval places a number of conditions which could restrict delivery. Policy East of Rugeley mixed use development 1130 dwellings in line with Appendix G LPS however includes Borrow Pit but Policy R1 LPA retains this features therefore no longer deliver 450 therefore policy East of Rugeley out of date.	Comments noted, the location of new growth will need to be considered during the Review
SIO1429	Richborough Estates KB (Pegasus NC)	7	Additional policies trigger for review of plan should be included. Reserve sites should be identified. Consideration to safeguarding land in order for Green Belt sites on settlement edges may be brought forward if required. This is supported by NPPF and Draft NPPF - Green Belt should be identified in Local Plans in order to meet longer term development needs stretching well beyond the Plan period.	<p>A review trigger would only be necessary were there something specific that might trigger a review ahead of the NPPF 5 year review timetable</p> <p>The need for safeguarding land would need to be established in the Review. However it is currently considered to produce a Plan that does not necessitate the need for safeguarding</p>

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1430	Richborough Estates KB (Pegasus NC)	Whole Document	Existing issues the vision and SP are set out in LPS 2015. Agree that these will remain broadly relevant as a starting point for LPR.	Support noted.
SIO1431	Richborough Estates KB (Pegasus NC)	8	Table 3.1 reads more like a set of objectives with only number 2, 3 and 9 setting out issues to be addressed.	Comments noted a review of the objectives and there delivery will be undertaken
SIO1432	Richborough Estates KB (Pegasus NC)	9	Vision and approach remain relevant and is supported. But consider vision should be more ambitious opportunities in District and wider areas HS2 and common wealth games.	Comments noted sub-regional, regional and national initiatives will need to be assessed to identify whether there is scope to incorporate within the vision
SIO1433	Richborough Estates KB (Pegasus NC)	10	Majority of Strategic priorities are considered broadly relevant SP 6 refer only to the needs of Lichfield. It should be amended to also refer to BBGMA and identified as issue 1 within the consultation document and referred to under the previous response to question 2 of this consultation. Levels of Growth Chapter 6 states "different types and levels of growth that will need to be considered and potentially accommodated through the LPR process" but significant level of growth will relate to GBHMA. No indication of the proportion of identified unmet need will be considered through the review process. Understand co-operate with LPA and GBHMA other areas North Warwickshire and Solihull have identified a quantities commitment. Accepted GBHMA identifies a range of strategic growth options and the LPR should consider all relevant further options that could boost housing supply in District.	The Review does include reference to the GBHMA shortfall. However it is recognised that the Plan Review will need to deal with cross boundary issues
SIO1434	Richborough Estates KB (Pegasus NC)	11	NPPF and draft NPPF stance on local plans based on proportionate relevant up to date evidence. Following require updating Green Belt Review 2012 NPPF advises LA to set own approach to housing density to reflect local circumstance. Draft NPPF advises anticipated shortage of housing LA to use minimum density standard for city and town centres and other locations that are well served by Transport, and those standards should seek uplift in average density of residential development in those areas unless strong reasons why this would be inappropriate, also notes could set a range of densities that reflect the accessibility and potential of different areas. LDC is a diverse in density, if density standards are incorporated in LPR should be minimum making reference to character of the local areas and the housing mix determined by local need. May require a variety of densities.	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO1435	Richborough Estates KB (Pegasus NC)	12	LPR identifies unmet shortfall from GBHMA and element to fall to Lichfield to be delivered. DC should assist in meeting these unmet needs through identifying additional land for development in sustainable location and in making best use of existing infrastructure in sustainable locations with strong links to the conurbation. Could require a range of development options in a range of settlements. Also consider benefits to the District, unlocking government funding for economic growth, LEPS.	Comments noted. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield.
SIO1436	Richborough Estates KB (Pegasus NC)	13	A key priority of the Government is to boost the supply of housing by a variety of means to meet the varied housing needs of people across the UK. Self-build and custom housebuilding has been identified as a significant element of the Government's agenda to increase housing supply. The NPPF and the new draft NPPF both give explicit support to policies which would plan for a mix of housing based on the needs of different groups in the community, including people wishing to commission or build their own homes. In addition, paragraph 159 of the NPPF sets out that Local Planning Authorities (LPAs) have a duty to assess the local demand for self-build plots and must also make provision for that demand. With regard to facilitating the provision of self-build and custom build housing within Lichfield District the identification of specific sites for such development is favoured, as this option would have a greater chance of ensuring that the needs of local people wishing to build their own homes are met. It is recommended that these sites are specifically allocated as self-build/custom build housing sites within the Local Plan Review document.	Comments noted. This will be considered further as the Local Plan Review progresses and will be informed by a range of evidence.
SIO1437	Richborough Estates KB (Pegasus NC)	14	LPS undertake a strategic review of land within their ownership to identify smaller plots and sites. Planning briefs to provide certainty. Recognised not always suitable as not all LPS have large land holdings.	Comments noted. This will be considered further as the Local Plan Review progresses and will be informed by a range of evidence.
SIO1438	Richborough Estates KB (Pegasus NC)	17	Lichfield Centres Study published 2017 recent but LPR will span 2020-2026 consider evidence updated following completion of Friargate and Lichfield City Centre and Mill Green Designer Outlet Village CCD which is under construction. Once above factors resolved better informed the retail and office requirements for the purpose of the LPR	Comments noted. This will be considered further as the Local Plan Review progresses.
SIO1439	Richborough Estates KB (Pegasus NC)	18	Not favoured a single comprehensive plan is preferred updated at least every five years. Minimise resource improve consistency and clarity. Local plan matters could be considered through NPs Whittington and Fisherwick NP made negates the need for additional DPD for Whittington. Note LPR review may result in inconsistencies with NP e.g. increased level of growth in an area.	Comments noted. The revised NPPF is due to be published summer 2018 and set out that Local Plan should be reviewed every 5 years.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1440	Richborough Estates KB (Pegasus NC)	19	LPR should also include policies and strategic allocations necessary to provide appropriate leisure, recreation infrastructure and community facilities.	Comments noted. Infrastructure provision will be considered as part of the testing of each option.
SIO1441	Wallace Land Development - Hospital Road (Planning Prospects)	Whole Document	<p>Promotes land off Hospital Road, Burntwood</p> <p>The existing vision will need to be updated to reflect the District's approach to delivering a proportion of unmet housing need from the GBHMA. The Strategic Objectives remain relevant to the Local Plan Review but will require updating to reflect the Growth Strategy. Plan period proposes to address 16 year period between 2020-2036 this seems reasonable and reflects the requirements of the Framework.</p> <p>Consultation does not focus on specific levels of growth. It does consider a broad assessment for potential areas for growth which rely on a number of growth scenarios.</p> <p>Housing Need: at this stage there is uncertainty in how housing need should be calculated using the new standard methodology and depending on the outcome of the NPPF consultation this requirement could fluctuate. Regardless of the figure the release of Green Belt land will be fundamental for the delivery</p> <p>GBHMA: There is a minimum shortfall of 28,150 dwellings to 2031 and 60,900 dwellings to 2036 across Birmingham HMA. Study suggests densities could be increased in the HMA, even if this was implemented there is still a need for additional land to become available to meet the housing shortfall in the HMA. Would not support a blanket approach to increasing densities. The study identifies options however it has not looked or considered in any detail the impact on the Green Belt or contribution of areas to the Green Belt. The report is a starting point. Acknowledges Burntwood is a constrained settlement and there are parcels to the east and south east which offer little function or purpose to the Green Belt and are otherwise constraint free. Essential the Review fully considers and contributes strongly to the unmet needs of the GBHMA.</p> <p>Supports the approach to review and update the majority of the adopted Local Plan policies. Whilst a number of reports are already reviewed on an annual basis, other evidence base sources will be fundamental such as Green Belt Review. Generally agree with the listed policies and evidence base documents proposed for review.</p> <p>Confirms land at Hospital Road is suitable, available and deliverable for up to 180 dwellings including 40% of affordable, together with associated infrastructure, community uses and significant areas of public open space. Submits a vision document in support of the site.</p>	Site is outside village boundary; and close to public transport routes. Provision of services and facilities may be required to assist sustainability. Within Green Belt. Does not wholly comply with current development plan policies in the Local Plan, however, site falls within broad area for search for assessment of sites which could contribute to sustainable mixed communities. Flood zone 2 (part) 3a (part). SFRA may be required. Landfill site within 50m, further investigation may be required. Loss of Grade 2/3 Agricultural Land may need justification. Site falls within the FOM and contributions to these projects may be required. An SBI is within 1km and the impact on it may need further investigation. Site has potential for protected species. Site is within the Cannock Chase zone of influence therefore mitigation may be required. Consultation document questions on level of growth invited comments on how consultees consider it should be met in order to help LDC make deliverable proposals. Green Belt review proposed in appendix A of consultation document.
SIO1442	Richborough Estates KB (Pegasus NC)	20	IDP will inform the new development strategy level of housing employment retail growth should be determined first. Richborough Estates consider residential development focused in Whittington could assist in supporting exiting and providing social physical and green infrastructure in a timely manner to ensure any impacts of development are mitigated and assist in delivering NP objectives.	Comments noted. The District Council is committed to working with strategy providers, developers and other service providers to enable the sustainable development within the District.
SIO1443	Richborough Estates KB (Pegasus NC)	Whole Document	Residential Growth Options Identification of broad strategic options could be considered alone or in combination as potential spatial strategies to deliver the growth requirements of the District is supported. These sour options reflect originally considered to inform development of LPS and broad enough to encompass the areas of search for GBHMA. Richborough Estates wish to express the following in respect of the Residential Growth Options albeit reserve the right to provide further views once the appropriate quantum of residential development has been identified.	Comments noted.
SIO1444	Richborough Estates KB (Pegasus NC)	21	Residential Growth Option (Town Focused) benefits - re-using brownfield land utilising infrastructure, supporting existing services and facilities, high density where appropriate, allow for urban extensions outside LDC boundaries assist in meeting cross boundary needs, meet needs close to where they arise, wide range of types and tenures, delivery green infrastructure, community sporting facilities through urban extensions. But other sustainable settlements e.g. Kings Bromley would see population decline services and facilities lost. Town focus growth may lead to pressure on services and facilities within those settlements – release of sites on the edge of settlements such as Kings Bromley to provide long term options for housing alleviating pressures within existing urban areas.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1445	Richborough Estates KB (Pegasus NC)	22	Residential Growth Option (Town Focused) benefits - re-using brownfield land utilising infrastructure, supporting existing services and facilities, high density where appropriate, allow for urban extensions outside LDC boundaries assist in meeting cross boundary needs, meet needs close to where they arise, wide range of types and tenures, delivery green infrastructure, community sporting facilities through urban extensions. But other sustainable settlements e.g. Kings Bromley would see population decline services and facilities lost. Town focus growth may lead to pressure on services and facilities within those settlements – release of sites on the edge of settlements such as Kings Bromley to provide long term options for housing alleviating pressures within existing urban areas.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1446	Richborough Estates KB (Pegasus NC)	23	Town & Key Rural Village Focused Development continuation of the spatial strategy in LPS 2015. Focus on main urban areas slightly reduced level than Option 1 and modest growth in rural settlements. Considered the appropriate option for housing growth to 2036 greater range of sustainable sites increase housing choice. Settlements identified suitable to remain key rural settlements - good level of services and facilities and accessibility to services in higher order settlements. But opportunity to update RSSS new evidence to categorise settlements, changes and new settlements could be added. Kings Bromley is a settlement that has seen the delivery of additional services and facilities since publication of RSSS. Provide a range of housing types in sustainable locations in line with BSGS. Housing in these areas would help maintained services. Challenges highlighted, more likely greenfield leading green belt boundary changes. But should see this not as challenge LPR offers opportunity to re-examine settlement and Green Belt Boundaries. Consider allocating sites beyond such boundaries and that should be redefined as necessary through the LPR process.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO1447	Richborough Estates KB (Pegasus NC)	24	Town & Key Rural Village Focused Development continuation of the spatial strategy in LPS 2015. Focus on main urban areas slightly reduced level than Option 1 and modest growth in rural settlements. Considered the appropriate option for housing growth to 2036 greater range of sustainable sites increase housing choice. Settlements identified suitable to remain key rural settlements - good level of services and facilities and accessibility to services in higher order settlements. But opportunity to update RSSS new evidence to categorise settlements, changes and new settlements could be added. Kings Bromley is a settlement that has seen the delivery of additional services and facilities since publication of RSSS. Provide a range of housing types in sustainable locations in line with BSGS. Housing in these areas would help maintained services. Challenges highlighted, more likely greenfield leading green belt boundary changes. But should see this not as challenge LPR offers opportunity to re-examine settlement and Green Belt Boundaries. Consider allocating sites beyond such boundaries and that should be redefined as necessary through the LPR process.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO1448	Richborough Estates KB (Pegasus NC)	26	Dispersed Growth would be distributed across a wide range of settlements - considered those listed with identified settlement boundaries represent the most sustainable settlements within the District. Note consideration of smaller settlements and hamlets via Green Belt review updated evidence base. Kings Bromley settlement outside Green Belt therefore no need for Exceptional circumstances. Option would meet housing need where they arise support village services and facilities in isolation this option would be least sustainable growth option. Combining other options with growth at some of the more sustainable smaller settlements may therefore be a more suitable strategy for the LPR.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1449	Richborough Estates KB (Pegasus NC)	27	Dispersed Growth would be distributed across a wide range of settlements - considered those listed with identified settlement boundaries represent the most sustainable settlements within the District. Note consideration of smaller settlements and hamlets via Green Belt review updated evidence base. Kings Bromley settlement outside Green Belt therefore no need for Exceptional circumstances. Option would meet housing need where they arise support village services and facilities in isolation this option would be least sustainable growth option. Combining other options with growth at some of the more sustainable smaller settlements may therefore be a more suitable strategy for the LPR.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1450	Richborough Estates KB (Pegasus NC)	28	New Settlement: Development would be focused in one or more new settlements. The Scope Issues and Options documents identifies a number of opportunities and challenges with this option. Richborough broadly agree but was considered previously by LDC in the LPS process and determined that the challenges outweighed opportunities. Delivery would require investment in infrastructure long lead in times 5-10 years uncertainty regarding market saturation not a considered appropriate solution in isolation. Likely result in failure to meet Housing delivery test in emerging NPPF - 95% delivery rate over a three year period. Range of sites spread across the District would provide greater resilience in supply and ensure the new Housing Delivery Test is satisfied. Growth Option 3 would result in no growth being focused in sustainable rural settlements = locally derived housing need not being met within villages such as Kings Bromley undermine existing services and facilities relied upon by residents within these key rural settlements and smaller villages and hamlets within their hinterland.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1451	Richborough Estates KB (Pegasus NC)	30	New Settlement: Development would be focused in one or more new settlements. The Scope Issues and Options documents identifies a number of opportunities and challenges with this option. Richborough broadly agree but was considered previously by LDC in the LPS process and determined that the challenges outweighed opportunities. Delivery would require investment in infrastructure long lead in times 5-10 years uncertainty regarding market saturation not a considered appropriate solution in isolation. Likely result in failure to meet Housing delivery test in emerging NPPF - 95% delivery rate over a three year period. Range of sites spread across the District would provide greater resilience in supply and ensure the new Housing Delivery Test is satisfied. Growth Option 3 would result in no growth being focused in sustainable rural settlements = locally derived housing need not being met within villages such as Kings Bromley undermine existing services and facilities relied upon by residents within these key rural settlements and smaller villages and hamlets within their hinterland.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1452	Richborough Estates KB (Pegasus NC)	37	<p>Spatial Strategy needs to be constraints with vision and SP need to implement Vision. Retaining vision follows that the spatial strategy within LPR should focus growth on main centres, key settlements. Strategy provision for cross boundary growth Rugeley and Tamworth and GBHMA. Development in higher order smaller settlements should be identified as a preferred option - continuation of Option 2 element 3. Land at Lichfield Road Kings Bromley Richborough Estates 3.56 Hectares arable field Appendix Site location. To assist LPR preliminary tech work undertaken demonstrates suitable sustainable and deliverable site for meeting housing needs to 2036 yield 70 Appendix 4 prom document. Highways Access via priority junction form Lichfield Road. Emergency access Crawley Road. Marginally narrowing carriageway of Lichfield Road - appropriate visibility achieved. Footways 1.8 metres two into existing. Additional pedestrian cycle link. Social Infrastructure 500 from village centre, Coop Pub Village Hall School cricket club church equipped play. Pedestrian link proposed to Village centre and School. Kings Bromley regular bus service nearest bus stop 600 metres. Transport Technical Note, Appendix 2. Natural Environment no statutory designations within site. Ecological appraisal Key habitats limited to hedges. Potential for birds bats badger great crest newt. Otter and water vole survey recommended 20mo f Crawley Brook. Further survey GCN. Bat emergence survey recommended. Impact on breeding birds can be avoided. Further surveys of riparian animals and GCN no sign of otter water vole of GCN. Bat survey recommends the retention and protection of hedges and provision of a buffer areas no build are between Brook and built development minimal hedgerow removal and planting as compensation. Comprehensive Ecological assessment will be undertaken in due course no indication that site could not come forward localised consideration would influence green infrastructure framework contribute to achieving environmental sustainability. Landscape character assessment appropriate for residential development in landscape terms. Edge of village bound by new development which defined residential edge in both local and wider views. Opportunity to retain trees and verges that reflect the current residential street scene. Site placed within an urban fringe location that is characterised by residential development at the interface with the wider landscape. Opportunities to enhance hedge rows tree planting including blocks of woodland strengthen the landscape character reinstate lost features long characteristic views across agricultural landscape and filtered view of settlement edge. In line with Councils landscape character assessment SPG. Site not situated either nationally or locally as being designated for its landscape value quality condition or sensitivity See appendix 3. Cultural Heritage No designated heritage assets within or immediately adjacent to the site. Flood Risk Flood Zone 2 south eastern tip FZ 3. SuDs will be included. Economic benefits Construction jobs. Protect local services. Masterplan Appendix 4 Key features single point of highway access, development set back, layout simple block structure, 2.19 hectares 70 yield at 32dph, retain tree frontage, storm attenuation pond, New tree planting eastern and southern edge, landscape buffer northern bounder, 1.37 hectares of open space 38% of total site areas opportunities for recreation, landscape and biodiversity. Summary suitable for development free of constraints achievable five years available now, deliverable NPPF Para 47.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1453	Wallace Land Development - Lichfield Road (Planning Prospects)		<p>Promotes land at Lichfield Road, Burntwood</p> <p>The existing vision will need to be updated to reflect the District's approach to delivering a proportion of unmet housing need from the GBHMA. The Strategic Objectives remain relevant to the Local Plan Review but will require updating to reflect the Growth Strategy. Plan period proposes to address 16 year period between 2020-2036 this seems reasonable and reflects the requirements of the Framework.</p> <p>Consultation does not focus on specific levels of growth. It does consider a broad assessment for potential areas for growth which rely on a number of growth scenarios.</p> <p>Housing Need: at this stage there is uncertainty in how housing need should be calculated using the new standard methodology and depending on the outcome of the NPPF consultation this requirement could fluctuate. Regardless of the figure the release of Green Belt land will be fundamental for the delivery</p> <p>GBHMA: There is a minimum shortfall of 28,150 dwellings to 2031 and 60,900 dwellings to 2036 across Birmingham HMA. Study suggests densities could be increased in the HMA, even if this was implemented there is still a need for additional land to become available to meet the housing shortfall in the HMA. Would not support a blanket approach to increasing densities. The study identifies options however it has not looked or considered in any detail the impact on the Green Belt or contribution of areas to the Green Belt. The report is a starting point. Acknowledges Burntwood is a constrained settlement and there are parcels to the east and south east which offer little function or purpose to the Green Belt and are otherwise constraint free. Essential the Review fully considers and contributes strongly to the unmet needs of the GBHMA.</p> <p>Supports the approach to review and update the majority of the adopted Local Plan policies. Whilst a number of reports are already reviewed on an annual basis, other evidence base sources will be fundamental such as Green Belt Review. Generally agree with the listed policies and evidence base documents proposed for review.</p> <p>Confirms land at Lichfield Road is suitable, available and deliverable for up to 300 dwellings including 40% of affordable, together with associated infrastructure, community uses and significant areas of public open space. Submits a vision document in support of the site.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1454	Wallace Land - Hospital Road (Planning Prospects)	22	<p>Promotes land off Hospital Road, Burntwood</p> <p>Residential Option 1 is the most logical and appropriate growth strategy to strategically deliver growth over the Plan period. However, focusing development in just two urban locations does not distribute growth or benefits of growth and is ultimately not a sustainable option on its own.</p> <p>Residential Option 2 reflects the adopted Local Plan Strategy and is failing to deliver the housing requirement for the District. Burntwood has seen limited growth and is capable of delivering additional development. Release of green belt land is essential to provide for a deliverable range and scale of new development appropriate to Burntwood. Burntwood is a strategic location for growth under Residential Option 1 and 2 but is bound by Green Belt. It is inevitable that the release of Green Belt will be required to enable any further strategic level of growth in and around the settlement.</p> <p>Given the likely level of growth a combination of SUE (500 plus) and medium scale developments (up to 500) would be the most logical choice for delivery.</p> <p>Option 3 - which it is recognised that there are benefits in directing some limited growth to the rural areas this option is unlikely to deliver the level of growth required by the Local Plan and will not be sustainable to deliver higher levels of growth. Housing delivery is likely to be less.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1455	Wallace Land - Hospital Road (Planning Prospects)	23	<p>Promotes land off Hospital Road, Burntwood</p> <p>Residential Option 1 is the most logical and appropriate growth strategy to strategically deliver growth over the Plan period. However, focusing development in just two urban locations does not distribute growth or benefits of growth and is ultimately not a sustainable option on its own.</p> <p>Residential Option 2 reflects the adopted Local Plan Strategy and is failing to deliver the housing requirement for the District. Burntwood has seen limited growth and is capable of delivering additional development. Release of green belt land is essential to provide for a deliverable range and scale of new development appropriate to Burntwood. Burntwood is a strategic location for growth under Residential Option 1 and 2 but is bound by Green Belt. It is inevitable that the release of Green Belt will be required to enable any further strategic level of growth in and around the settlement.</p> <p>Given the likely level of growth a combination of SUE (500 plus) and medium scale developments (up to 500) would be the most logical choice for delivery.</p> <p>Option 3 - which it is recognised that there are benefits in directing some limited growth to the rural areas this option is unlikely to deliver the level of growth required by the Local Plan and will not be sustainable to deliver higher levels of growth. Housing delivery is likely to be less.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1456	Wallace Land - Hospital Road (Planning Prospects)	24	<p>Promotes land off Hospital Road, Burntwood</p> <p>Residential Option 1 is the most logical and appropriate growth strategy to strategically deliver growth over the Plan period. However, focusing development in just two urban locations does not distribute growth or benefits of growth and is ultimately not a sustainable option on its own.</p> <p>Residential Option 2 reflects the adopted Local Plan Strategy and is failing to deliver the housing requirement for the District. Burntwood has seen limited growth and is capable of delivering additional development. Release of green belt land is essential to provide for a deliverable range and scale of new development appropriate to Burntwood. Burntwood is a strategic location for growth under Residential Option 1 and 2 but is bound by Green Belt. It is inevitable that the release of Green Belt will be required to enable any further strategic level of growth in and around the settlement.</p> <p>Given the likely level of growth a combination of SUE (500 plus) and medium scale developments (up to 500) would be the most logical choice for delivery.</p> <p>Option 3 - which it is recognised that there are benefits in directing some limited growth to the rural areas this option is unlikely to deliver the level of growth required by the Local Plan and will not be sustainable to deliver higher levels of growth. Housing delivery is likely to be less.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1457	Wallace Land - Hospital Road (Planning Prospects)	25	<p>Promotes land off Hospital Road, Burntwood</p> <p>Residential Option 1 is the most logical and appropriate growth strategy to strategically deliver growth over the Plan period. However, focusing development in just two urban locations does not distribute growth or benefits of growth and is ultimately not a sustainable option on its own.</p> <p>Residential Option 2 reflects the adopted Local Plan Strategy and is failing to deliver the housing requirement for the District. Burntwood has seen limited growth and is capable of delivering additional development. Release of green belt land is essential to provide for a deliverable range and scale of new development appropriate to Burntwood. Burntwood is a strategic location for growth under Residential Option 1 and 2 but is bound by Green Belt. It is inevitable that the release of Green Belt will be required to enable any further strategic level of growth in and around the settlement.</p> <p>Given the likely level of growth a combination of SUE (500 plus) and medium scale developments (up to 500) would be the most logical choice for delivery.</p> <p>Option 3 - which it is recognised that there are benefits in directing some limited growth to the rural areas this option is unlikely to deliver the level of growth required by the Local Plan and will not be sustainable to deliver higher levels of growth. Housing delivery is likely to be less.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1458	Wallace Land - Lichfield Road (Planning Prospects)	21	<p>Promotes land at Lichfield Road, Burntwood</p> <p>Residential Option 1 is the most logical and appropriate growth strategy to strategically deliver growth over the Plan period. However, focusing development in just two urban locations does not distribute growth or benefits of growth and is ultimately not a sustainable option on its own.</p> <p>Residential Option 2 reflects the adopted Local Plan Strategy and is failing to deliver the housing requirement for the District. Burntwood has seen limited growth and is capable of delivering additional development. Release of green belt land is essential to provide for a deliverable range and scale of new development appropriate to Burntwood. Burntwood is a strategic location for growth under Residential Option 1 and 2 but is bound by Green Belt. It is inevitable that the release of Green Belt will be required to enable any further strategic level of growth in and around the settlement.</p> <p>Given the likely level of growth a combination of SUE (500 plus) and medium scale developments (up to 500) would be the most logical choice for delivery.</p> <p>Option 3 - which it is recognised that there are benefits in directing some limited growth to the rural areas this option is unlikely to deliver the level of growth required by the Local Plan and will not be sustainable to deliver higher levels of growth. Housing delivery is likely to be less.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1459	Wallace Land - Lichfield Road (Planning Prospects)	22	<p>Promotes land at Lichfield Road, Burntwood</p> <p>Residential Option 1 is the most logical and appropriate growth strategy to strategically deliver growth over the Plan period. However, focusing development in just two urban locations does not distribute growth or benefits of growth and is ultimately not a sustainable option on its own.</p> <p>Residential Option 2 reflects the adopted Local Plan Strategy and is failing to deliver the housing requirement for the District. Burntwood has seen limited growth and is capable of delivering additional development. Release of green belt land is essential to provide for a deliverable range and scale of new development appropriate to Burntwood. Burntwood is a strategic location for growth under Residential Option 1 and 2 but is bound by Green Belt. It is inevitable that the release of Green Belt will be required to enable any further strategic level of growth in and around the settlement.</p> <p>Given the likely level of growth a combination of SUE (500 plus) and medium scale developments (up to 500) would be the most logical choice for delivery.</p> <p>Option 3 - which it is recognised that there are benefits in directing some limited growth to the rural areas this option is unlikely to deliver the level of growth required by the Local Plan and will not be sustainable to deliver higher levels of growth. Housing delivery is likely to be less.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1460	Wallace Land - Lichfield Road (Planning Prospects)	23	<p>Promotes land at Lichfield Road, Burntwood</p> <p>Residential Option 1 is the most logical and appropriate growth strategy to strategically deliver growth over the Plan period. However, focusing development in just two urban locations does not distribute growth or benefits of growth and is ultimately not a sustainable option on its own.</p> <p>Residential Option 2 reflects the adopted Local Plan Strategy and is failing to deliver the housing requirement for the District. Burntwood has seen limited growth and is capable of delivering additional development. Release of green belt land is essential to provide for a deliverable range and scale of new development appropriate to Burntwood. Burntwood is a strategic location for growth under Residential Option 1 and 2 but is bound by Green Belt. It is inevitable that the release of Green Belt will be required to enable any further strategic level of growth in and around the settlement.</p> <p>Given the likely level of growth a combination of SUE (500 plus) and medium scale developments (up to 500) would be the most logical choice for delivery.</p> <p>Option 3 - which it is recognised that there are benefits in directing some limited growth to the rural areas this option is unlikely to deliver the level of growth required by the Local Plan and will not be sustainable to deliver higher levels of growth. Housing delivery is likely to be less.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1461	Wallace Land - Lichfield Road (Planning Prospects)	24	<p>Promotes land at Lichfield Road, Burntwood</p> <p>Residential Option 1 is the most logical and appropriate growth strategy to strategically deliver growth over the Plan period. However, focusing development in just two urban locations does not distribute growth or benefits of growth and is ultimately not a sustainable option on its own.</p> <p>Residential Option 2 reflects the adopted Local Plan Strategy and is failing to deliver the housing requirement for the District. Burntwood has seen limited growth and is capable of delivering additional development. Release of green belt land is essential to provide for a deliverable range and scale of new development appropriate to Burntwood. Burntwood is a strategic location for growth under Residential Option 1 and 2 but is bound by Green Belt. It is inevitable that the release of Green Belt will be required to enable any further strategic level of growth in and around the settlement.</p> <p>Given the likely level of growth a combination of SUE (500 plus) and medium scale developments (up to 500) would be the most logical choice for delivery.</p> <p>Option 3 - which it is recognised that there are benefits in directing some limited growth to the rural areas this option is unlikely to deliver the level of growth required by the Local Plan and will not be sustainable to deliver higher levels of growth. Housing delivery is likely to be less.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1462	Wallace Land - Lichfield Road (Planning Prospects)	25	<p>Promotes land at Lichfield Road, Burntwood</p> <p>Residential Option 1 is the most logical and appropriate growth strategy to strategically deliver growth over the Plan period. However, focusing development in just two urban locations does not distribute growth or benefits of growth and is ultimately not a sustainable option on its own.</p> <p>Residential Option 2 reflects the adopted Local Plan Strategy and is failing to deliver the housing requirement for the District. Burntwood has seen limited growth and is capable of delivering additional development. Release of green belt land is essential to provide for a deliverable range and scale of new development appropriate to Burntwood. Burntwood is a strategic location for growth under Residential Option 1 and 2 but is bound by Green Belt. It is inevitable that the release of Green Belt will be required to enable any further strategic level of growth in and around the settlement.</p> <p>Given the likely level of growth a combination of SUE (500 plus) and medium scale developments (up to 500) would be the most logical choice for delivery.</p> <p>Option 3 - which it is recognised that there are benefits in directing some limited growth to the rural areas this option is unlikely to deliver the level of growth required by the Local Plan and will not be sustainable to deliver higher levels of growth. Housing delivery is likely to be less.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1463	Wallace Land - Hospital Road (Planning Prospects)	28	<p>Promotes land off Hospital Road, Burntwood</p> <p>Growth Option 4 proposes a new settlement. Acknowledged a new settlement could enable the vast majority of homes to be delivered within one site. This can only be seen as a long term option which would not necessarily deliver the level of housing that is required over the Plan period or certainly over the early years of the plan period. To ensure a flexible and deliverable housing land supply, a sound local plan and housing trajectory. Would welcome the Council to identify a combination of small, medium and large sized sites in different market locations to ensure choice, competition and most importantly delivery of new market and affordable homes.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1464	Wallace Land - Hospital Road (Planning Prospects)	29	<p>Promotes land off Hospital Road, Burntwood</p> <p>Growth Option 4 proposes a new settlement. Acknowledged a new settlement could enable the vast majority of homes to be delivered within one site. This can only be seen as a long term option which would not necessarily deliver the level of housing that is required over the Plan period or certainly over the early years of the plan period. To ensure a flexible and deliverable housing land supply, a sound local plan and housing trajectory. Would welcome the Council to identify a combination of small, medium and large sized sites in different market locations to ensure choice, competition and most importantly delivery of new market and affordable homes.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1465	Wallace Land - Hospital Road (Planning Prospects)	30	<p>Promotes land off Hospital Road, Burntwood</p> <p>Growth Option 4 proposes a new settlement. Acknowledged a new settlement could enable the vast majority of homes to be delivered within one site. This can only be seen as a long term option which would not necessarily deliver the level of housing that is required over the Plan period or certainly over the early years of the plan period. To ensure a flexible and deliverable housing land supply, a sound local plan and housing trajectory. Would welcome the Council to identify a combination of small, medium and large sized sites in different market locations to ensure choice, competition and most importantly delivery of new market and affordable homes.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1466	Wallace Land - Lichfield Road (Planning Prospects)	28	<p>Promotes land at Lichfield Road, Burntwood</p> <p>Growth Option 4 proposes a new settlement. Acknowledged a new settlement could enable the vast majority of homes to be delivered within one site. This can only be seen as a long term option which would not necessarily deliver the level of housing that is required over the Plan period or certainly over the early years of the plan period. To ensure a flexible and deliverable housing land supply, a sound local plan and housing trajectory. Would welcome the Council to identify a combination of small, medium and large sized sites in different market locations to ensure choice, competition and most importantly delivery of new market and affordable homes.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1467	Wallace Land - Lichfield Road (Planning Prospects)	29	<p>Promotes land at Lichfield Road, Burntwood</p> <p>Growth Option 4 proposes a new settlement. Acknowledged a new settlement could enable the vast majority of homes to be delivered within one site. This can only be seen as a long term option which would not necessarily deliver the level of housing that is required over the Plan period or certainly over the early years of the plan period. To ensure a flexible and deliverable housing land supply, a sound local plan and housing trajectory. Would welcome the Council to identify a combination of small, medium and large sized sites in different market locations to ensure choice, competition and most importantly delivery of new market and affordable homes.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1468	Wallace Land - Lichfield Road (Planning Prospects)	30	<p>Promotes land at Lichfield Road, Burntwood</p> <p>Growth Option 4 proposes a new settlement. Acknowledged a new settlement could enable the vast majority of homes to be delivered within one site. This can only be seen as a long term option which would not necessarily deliver the level of housing that is required over the Plan period or certainly over the early years of the plan period. To ensure a flexible and deliverable housing land supply, a sound local plan and housing trajectory. Would welcome the Council to identify a combination of small, medium and large sized sites in different market locations to ensure choice, competition and most importantly delivery of new market and affordable homes.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1469	Wallace Land - Hospital Road (Planning Prospects)	31	The two employment options proposed are to expand existing employment locations or provide new locations for employment in the District. To ensure that a sustainable growth strategy is delivered, the employment opportunities should reflect the locations of growth for housing to enable a sustainable pattern of growth in the District	Agreed- the SHLAA and ELAA are considered together; but totally mixed developments in all areas would be a change to the current strategy of use concentrations in existing employment areas and homes allocations.
SIO1470	Wallace Land - Hospital Road (Planning Prospects)	32	The two employment options proposed are to expand existing employment locations or provide new locations for employment in the District. To ensure that a sustainable growth strategy is delivered, the employment opportunities should reflect the locations of growth for housing to enable a sustainable pattern of growth in the District	see response to reference SIO1469
SIO1471	Wallace Land - Hospital Road (Planning Prospects)	33	The two employment options proposed are to expand existing employment locations or provide new locations for employment in the District. To ensure that a sustainable growth strategy is delivered, the employment opportunities should reflect the locations of growth for housing to enable a sustainable pattern of growth in the District	See response to representation SIO1470
SIO1472	Wallace Land - Hospital Road (Planning Prospects)	34?	The two employment options proposed are to expand existing employment locations or provide new locations for employment in the District. To ensure that a sustainable growth strategy is delivered, the employment opportunities should reflect the locations of growth for housing to enable a sustainable pattern of growth in the District	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1473	Wallace Land - Hospital Road (Planning Prospects)	35	The two employment options proposed are to expand existing employment locations or provide new locations for employment in the District. To ensure that a sustainable growth strategy is delivered, the employment opportunities should reflect the locations of growth for housing to enable a sustainable pattern of growth in the District	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1474	Wallace Land - Hospital Road (Planning Prospects)	36	The two employment options proposed are to expand existing employment locations or provide new locations for employment in the District. To ensure that a sustainable growth strategy is delivered, the employment opportunities should reflect the locations of growth for housing to enable a sustainable pattern of growth in the District	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1475	Wallace Land - Lichfield Road (Planning Prospects)	31	The two employment options proposed are to expand existing employment locations or provide new locations for employment in the District. To ensure that a sustainable growth strategy is delivered, the employment opportunities should reflect the locations of growth for housing to enable a sustainable pattern of growth in the District	see above
SIO1476	Wallace Land - Lichfield Road (Planning Prospects)	32	The two employment options proposed are to expand existing employment locations or provide new locations for employment in the District. To ensure that a sustainable growth strategy is delivered, the employment opportunities should reflect the locations of growth for housing to enable a sustainable pattern of growth in the District	see response to reference SIO1469

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1477	Wallace Land - Lichfield Road (Planning Prospects)	33	The two employment options proposed are to expand existing employment locations or provide new locations for employment in the District. To ensure that a sustainable growth strategy is delivered, the employment opportunities should reflect the locations of growth for housing to enable a sustainable pattern of growth in the District	See response to representation SIO1471
SIO1478	Wallace Land - Lichfield Road (Planning Prospects)	34?	The two employment options proposed are to expand existing employment locations or provide new locations for employment in the District. To ensure that a sustainable growth strategy is delivered, the employment opportunities should reflect the locations of growth for housing to enable a sustainable pattern of growth in the District	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1479	Wallace Land - Lichfield Road (Planning Prospects)	35	The two employment options proposed are to expand existing employment locations or provide new locations for employment in the District. To ensure that a sustainable growth strategy is delivered, the employment opportunities should reflect the locations of growth for housing to enable a sustainable pattern of growth in the District	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1480	Wallace Land - Hospital Road (Planning Prospects)	37	<p>Promoting land at Hospital Road, Burntwood</p> <p>Difficult to agree a preferred option because the level of housing need is unknown. Option 2 has already proven to under deliver. Believe a combination of options will enable more growth in the District. Lichfield and Burntwood are sustainable settlements which have substantial infrastructure and services already in place which can accommodate growth. The review should seek to provide a more even distribution of growth between Lichfield and Burntwood which would enable a substantial level of growth to occur. Growth in rural areas will allow natural and organic level of growth in other settlements. Possibility one or two urban extensions in other sustainable locations or a new settlement could be provided for if Lichfield and Burntwood and rural areas cannot identify sufficient land to accommodate the level of growth required in the Plan period.</p> <p>Burntwood has particular role in play and has been given limited growth as part of the LPS. The release of Green Belt land is pertinent to ensure that adequate land is available during the lifetime of the Plan period. Promoting land Hospital Road which would form a logical extension to the settlement.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1481	Bloor Homes (Pegasus NC)	Whole Document	Rep Pegasus on behalf of Bloor Homes - Coulter Lane Burntwood read alongside Site Location Plan Landscape and Visual Constraints and Opportunities Assessment Promotional Documents Economic Benefits Infographic to support allocation of Coulter Lane Burntwood. Prom Document provides - site specific and development proposals, drawing on technical assessments. Indicative masterplan showing how site could be developed. The site is suitable developable and deliverable. Identified as a site in the LPA. Yield 480 homes. Responses has regard to national and local policy. Framed Local Plan should be legally compliant and sound NPPF para 182. Planning Policy Context Supports review opportunity for comprehensive review of vision strategic objectives development requirements spatial development strategy and policies. In line with emerging NPPF up to date LP review every five years. timescales LDS will ensure that LP will be in place to support growth and meet future development needs. Scope issues and options consultation identifies key changes - unmet housing need GBHMA and opportunity to alignment with proposed NPPF. Bloor supports design process this rep expresses the following comments in respect of the scope and process identified.	Site is outside current settlement boundary but is adjacent to sustainable settlement of Burntwood and is in proximity to public transport routes, services and facilities. Within Green Belt. Does not wholly comply with current development plan policies in the Local Plan, however, site falls within broad area for search for assessment of sites which could contribute to sustainable mixed communities. Old quarry and well identified on site but not considered to affect development. SCC highlight negative impact on local highway network in this area. Small watercourse runs through site which may have an associated floodplain. Loss of Grade 2/3 Agricultural Land may need justification. Site falls within the FOM and contributions to these projects may be required. Site is within the Cannock Chase zone of influence therefore mitigation may be required. Comments noted.
SIO1482	Wallace Land - Lichfield Road (Planning Prospects)	36	The two employment options proposed are to expand existing employment locations or provide new locations for employment in the District. To ensure that a sustainable growth strategy is delivered, the employment opportunities should reflect the locations of growth for housing to enable a sustainable pattern of growth in the District	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1483	Bloor Homes (Pegasus NC)	1	Noted adoption anticipated 2020 plan period 2020-2036 = 16 year timeframe. Considered appropriate and in line with para 157 NPPF and stance of draft NPPF. Plan period will aligned with GBHMA SGS Feb 2018 which considers housing need - time frame 2036.	Comments noted

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1484	Bloor Homes (Pegasus NC)	2	<p>In light of NPPF requirements the following should be updated. Green Belt LDC 4 Pieces of Green Belt Evidence most recent July 2017. LPR documents refers to the Green Belt review as considering "whether there is any specific requirements to amend existing Green Belt boundaries to meet local rather than strategic need." LPR committed to consider GBBC HMA need consider Green Belt evidence review to address such strategic need. Review in line with NPPF para 135 = strategic Green Belt Study. LPA Supplementary Green Belt report 2016 assess parcels of land around Lichfield, Burntwood, Key Rural Settlements - identified smaller sites to be considered for removed from Green Belt to meet housing need in LPS. So the removal of these sites and other should be considered through evidence review justify LPR. Para 1.30 of Scope Issues and Options anticipates further local Green Belt documents also referred to in Appendix A. Housing SSD Housing Needs Study and SHMA 2012 (six years ago) included LDC TBC and CCD report considered demographic housing economic trends date from 2012 based sub national household projections. More recent data 2014 available and it is considered that if national planning policy remains as drafted SHMA should be refreshed in line with latest projections. Also 2016 based data will be published in summer 2018 once available should be used as a baseline for future housing growth. Housing White Paper and Planning for the Right Homes in the Right Places proposed standard Methodology for dwellings requirements if in revised NPPF (July) appropriate to use standard approach. 2014 projections LDC 2016-2026 + 275 households per annum. 2016 affordability ratio 8 + uplift of 24% = further 65 dwellings. Total dwelling requirements 340 per annum. But 2017 affordability ratio 8.5 = 78 dwelling uplift = 353 dwelling per annum. Dwelling requirement likely to change once 2016 population household projection published later in year. Comparing SHMA 410 dwellings and Standard Methodology 353 dwellings clear figures by the new methodology are lower. Due to use of earlier household projections - SHMA identified number of scenarios concluded dwelling requirement of 410 and 450. Standard Methodology only considers latest population projections no affordability ratio, no account for many factor previously considered to ensure housing is aligned with economic aspirations. Recommend further testing of standard methodology to ensure dwelling requires robust to 2036. Work with LEPS understand economic growth and align housing. LDC falls under GBBC HMA acknowledged that some authorities are unable to meet need LDC play a role Duty to Corporate to help met shortfall. Lichfield close to Birmingham and BC and strong functional relationship between the conurbation and settlements in LDC suitable and sustainable locations for growth to assist issue. Need for 825 homes between LDC North Warwickshire should be dealt with in LPR. SHousing needs Study appraised affordable housing partial update in earlier SHMA prior to 2012 now out of date Dynamic model based on Affordable Housing Viability Assessment 2012 needs refreshing. Rural Settlement Sustainability Study (RSSS) published 2016 to inform LPA requires updating review is strategic. Review may result in amendments in hierarchy of settlements should recognise Lichfield City and Burntwood includes a range of services and facilities including public transport. CCSAC review published in 2017 checked SAMMM still fit for purpose. Review concludes approach fit for current plan but some aspects should be focus of full review to a more comprehensive strategy in future - support and also evidence gathering to inform stage 2 of HRA. Also the following out of date Impact of Recreation to the CCSAC 2012 visitor impact mitigation strategy March 2010 Visitor Survey Feb 2013 review should inform amendments to Policy NR7 LPS 2015 that can be carried through into the LPR. Infrastructure IDP living Document number of evidence base studies require updating to assess emerging spatial options for LPR Draft Integrated transport Strategy 2011, indoor sports recreation playing pitches health and wellbeing air quality biodiversity renewable and low carbon energy water resources and supply. Viability LDC evidence base does not include a Local Plan Viability Assessment, requirement NPPF para 174 Of particular note is the NPPF's guidance that, "In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle", and that, "the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened". 2.31 It is therefore considered of paramount importance that a Viability Assessment is undertaken alongside the Local Plan Review.</p>	<p>Comments noted, consideration of a Green Belt Review will be undertaken</p> <p>Consideration to undertaking a HEDNA will be undertaken</p>
SIO1485	Wallace Land - Lichfield Road (Planning Prospects)	37	<p>Promoting land at Lichfield Road, Burntwood</p> <p>Difficult to agree a preferred option because the level of housing need is unknown. Option 2 has already proven to under deliver. Believe a combination of options will enable more growth in the District. Lichfield and Burntwood are sustainable settlements which have substantial infrastructure and services already in place which can accommodate growth. The review should seek to provide a more even distribution of growth between Lichfield and Burntwood which would enable a substantial level of growth to occur. Growth in rural areas will allow natural and organic level of growth in other settlements. Possibility one or two urban extensions in other sustainable locations or a new settlement could be provided for if Lichfield and Burntwood and rural areas cannot identify sufficient land to accommodate the level of growth required in the Plan period.</p> <p>Burntwood has particular role in play and has been given limited growth as part of the LPS. The release of Green Belt land is pertinent to ensure that adequate land is available during the lifetime of the Plan period. Promoting land Lichfield Road which would form a logical extension to the settlement.</p>	<p>Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.</p>

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SIO1486	FI Real Estate Management (DPP)	Whole Document	<p>Paragraph 1.9, Page 4: Understand this is initial stages and the Council has not yet formed a view on which sites and locations should be allocated for new development or which policies should be reviewed. Opportunity to support the early identification of a site such as Drayton Manor Business Park in terms of its potential to be improved and expanded.</p> <p>Representations on SWOT Para 2.34, Page 23: Surprised under weaknesses there is no mention of the amount of Green Belt within the District. This has to be regarded as a key weakness and a threat. Drayton Manor Business Park is entirely washed over by the Green Belt but it makes no sense to include a site that accommodates as many buildings and as much floorspace as the business park. It fails to satisfy key purpose of land in the Green Belt which is to keep it free of development. The green belt boundary should exclude the business park, the business park plus other land or pull the boundary of it much further to the south of business park and related developments nearby.</p> <p>Para 6.27-6.29, Page 35: Broadly supportive of the process towards setting a target for new jobs over the plan period but seek assurances that existing employment sites which aren't allocated for employment are properly dealt with through the review process. It is important that the Review enables the Council to ascertain whether a continuation of the strategy is appropriate or whether alternative options for employment land should be explored.</p>	The Government attaches great importance to Green Belts and therefore should be seen as a strength. Employment Land Review comment noted.
SIO1487	Bloor Homes (Pegasus NC)	3	LDC Identify a number of issues to consider under Duty to Co-operate. Unmet housing needs of the GB HMA council commitment to engage including Tamworth Housing needs. Concerns how housing shortfall will be addressed across HMA in a timely manner. Standard Methodology for housing needs sets a minimum figure, does not consider other factors, LDC overall housing figure for LPR due to proximity of neighbours with unmet need should reflect strategic cross boundary housing needs = far higher number than Standard mythology. GL Hearn report identifies minimum shortfall of 60,855.	Comments noted
SIO1488	Bloor Homes (Pegasus NC)	4	Agree	Comments noted
SIO1489	Bloor Homes (Pegasus NC)	5	Agree with Table 1.3 but several other also require minor amendments to either bring them into line with current national policy or update them in the light of further evidence. Core Policy 8: Our Centres and may necessitate changes to the Hierarchy of centres. Policy E1 Retail Assessment identification of further development at Burntwood could increase the relevant floorspace need to help support the delivery of an improved town centre.	The revised NPPF will need to be considered through the Local Plan Review process Comments noted, policy CP 8 and E1 will be considered through the Review.
SIO1490	Bloor Homes (Pegasus NC)	6	Policy Burntwood 5 is now considered to be out of date as the development is almost built out. Policy East of Rugeley is now out-of-date and requires amending accordingly. Policy North of Tamworth may require amendment through the review process as this plan approval places a number of conditions which could restrict delivery. Policy East of Rugeley mixed use development 1130 dwellings in line with Appendix G LPS however includes Borrow Pit but Policy R1 LPA retains this features therefore no longer deliver 450 therefore policy East of Rugeley out of date.	The Arkall Farm Inquiry resulted in outline permission being granted. Comments noted, the location of new growth will need to be considered during the Review
SIO1491	Bloor Homes (Pegasus NC)	7	Additional policies trigger for review of plan should be included. Reserve sites should be identified. Consideration to safeguarding land in order for Green Belt sites on settlement edges may be brought forward if required. This is supported by NPPF and Draft NPPF - Green Belt should be identified in Local Plans in order to meet longer term development needs stretching well beyond the Plan period.	A review trigger would only be necessary were there something specific that might trigger a review ahead of the NPPF 5 year review timetable The need for safeguarding land would need to be established in the Review. However it is currently considered to produce a Plan that does not necessitate the need for safeguarding
SIO1492	Bloor Homes (Pegasus NC)	Whole Document	Existing issues the vision and SP are set out in LPS 2015. Agree that these will remain broadly relevant as a starting point for LPR.	Comments noted.
SIO1493	Bloor Homes (Pegasus NC)	8	Table 3.1 reads more like a set of objectives with only number 2, 3 and 9 setting out issues to be addressed.	Comments noted a review of the objectives and there delivery will be undertaken
SIO1494	Bloor Homes (Pegasus NC)	9	Vision and approach remain relevant and is supported. But consider vision should be more ambitious opportunities in District and wider areas HS2 and common wealth games.	Comments noted sub-regional, regional and national initiatives will need to be assessed to identify whether there is scope to incorporate within the vision
SIO1495	Bloor Homes (Pegasus NC)	10	Majority of Strategic priorities are considered broadly relevant SP 6 refer only to the needs of Lichfield. It should be amended to also refer to BBGMA and identified as issue 1 within the consultation document and referred to under the previous response to question 2 of this consultation. Levels of Growth Chapter 6 states "different types and levels of growth that will need to be considered and potentially accommodated through the LPR process" but significant level of growth will relate to GBHMA. No indication of the proportion of identified unmet need will be considered through the review process. Understand co-operate with LPA and GBHMA other areas North Warwickshire and Solihull have identified a quantities commitment. Accepted GBHMA identifies a range of strategic growth options and the LPR should consider all relevant further options that could boost housing supply in District.	The Review does include reference to the GBHMA shortfall. However it is recognised that the Plan Review will need to deal with cross boundary issues
SIO1496	Bloor Homes (Pegasus NC)	11	NPPF advises LA to set own approach to housing density to reflect local circumstance. Draft NPPF advises anticipated shortage of housing LA to use minimum density standard for city and town centres and other locations that are well served by Transport, and those standards should seek uplift in average density of residential development in those areas unless strong reasons why this would be inappropriate, also notes could set a range of densities that reflect the accessibility and potential of different areas. LDC is a diverse in density, if density standards are incorporated in LPR should be minimum making reference to character of the local areas and the housing mix determined by local need. May require a variety of densities.	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1497	Bloor Homes (Pegasus NC)	12	LPR identifies unmet shortfall from GBHMA and element to fall to Lichfield to be delivered. DC should assist in meeting these unmet needs through identifying additional land for development in sustainable location and in making best use of existing infrastructure in sustainable locations with strong links to the conurbation. Could require a range of development options in a range of settlements. Also consider benefits to the District, unlocking government funding for economic growth, LEPS.	Comments noted. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield.
SIO1498	Bloor Homes (Pegasus NC)	13	A key priority of the Government is to boost the supply of housing by a variety of means to meet the varied housing needs of people across the UK. Self-build and custom housebuilding has been identified as a significant element of the Government's agenda to increase housing supply. The NPPF and the new draft NPPF both give explicit support to policies which would plan for a mix of housing ased on the needs of different groups in the community, including people wishing to commission or build their own homes. In addition, paragraph 159 of the NPPF sets out that Local Planning Authorities (LPA's) have a duty to assess the local demand for self-build plots and must also make provision for that demand. With regard to facilitating the provision of self-build and custom build housing within Lichfield District the identification of specific sites for such development is favoured, as this option would have a greater chance of ensuring that the needs of local people wishing to build their own homes are met. It is recommended that these sites are specifically allocated as self-build/custom build housing sites within the Local Plan Review document.	Comments noted. This will be considered further as the Local Plan Review progresses and will be informed by a range of evidence.
SIO1499	Bloor Homes (Pegasus NC)	14	LPS undertake a strategic review of land within their ownership to identify smaller plots and sites. Planning briefs to provide certainty. Recognised not always suitable as not all LPS have large land holdings.	Comments noted. This will be considered further as the Local Plan Review progresses and will be informed by a range of evidence.
SIO1500	Bloor Homes (Pegasus NC)	17	Lichfield Centres Study published 2017 recent but LPR will span 2020-2026 consider evidence updated following completion of Friargate and Lichfield City Centre and Mill Green Designer Outlet Village CCD which is under construction. Once above factors resolved better informed the retail and office requirements for the purpose of the LPR	Comments noted. This will be considered further as the Local Plan Review progresses.
SIO1501	Bloor Homes (Pegasus NC)	18	Not favoured a single comprehensive plan is preferred updated at least every five years. Minimise resource improve consistency and clarity. NPs one made can form element of development plan. Burntwood Town Council I sin the process of of formulating a NP and this focuses on aspirations to secure improved town centre facilities including retail and community uses.	Comments noted. The revised NPPF is due to be published summer 2018 and set out that Local Plan should be reviewed every 5 years.
SIO1502	Bloor Homes (Pegasus NC)	19	LPR should also include policies and strategic allocations necessary to provide appropriate leisure, recreation infrastructure and community facilities.	Comments noted. Infrastructure provision will be considered as part of the testing of each option.
SIO1503	Bloor Homes (Pegasus NC)	20	IDP will inform the new development strategy level of housing employment retail growth should be determined first. Burntwood local aspirations via emerging NP to improve social physical and green infrastructure + Objective 1, redevelop and regenerate Burntwood Town Centre, Objective 2 To protect and enhance neighbourhood shopping areas and local shops, Objective 4 to support the development of quality new housing and living environments that meet the community's need, Objective 6 to improve movement and accessibility within green environment. Objective 7 to retain and improve the provision of community leisure and recreation facilities. Bloor Homes consider that further residential development focused to Burntwood could assist in delivering the necessary infrastructure in a timely manner to ensure any impacts of development are mitigated and to asset in delivering the wider objectives as set out in the emerging NP.	Comments noted. The District Council is committed to working with strategy providers, developers and other service providers to enable the sustainable development within the District.
SIO1504	Bloor Homes (Pegasus NC)	Whole Document	Residential Growth Options Identification of broad strategic options could be considered alone or in combination as potential spatial strategies to deliver the growth requirements of the District is supported. These sour options reflect originally considered to inform development of LPS and broad enough to encompass the areas of search for GBHMA. Bloor Homes wish to express the following views in respect of the Residential Growth Options albeit they reserve the right to provide further views once the appropriate quantum of residential development has been identified.	Comments noted.
SIO1505	Bloor Homes (Pegasus NC)	21	Residential Growth Option (Town Focused) benefits - re-using brownfield land utilising infrastructure, supporting existing services and facilities, high density where appropriate, allow for urban extensions outside LDC boundaries assist in meeting cross boundary needs, meet needs close to where they arise, wide range of types and tenures, delivery green infrastructure, community sporting facilities through urban extensions. Burntwood is one only two urban areas within the District recognises as a highly sustainable location for development. Whilst Lichfield City is identified as a Strategic Centre within the adopted LPS Burntwood is identified as another large town and second within the settlement hierarchy second to only Lichfield City. Bloor Homes consider that Burntwood should continue its role as a focus for sustainable development to 2026 and beyond.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

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SIO1506	Bloor Homes (Pegasus NC)	22	Residential Growth Option (Town Focused) benefits - re-using brownfield land utilising infrastructure, supporting existing services and facilities, high density where appropriate, allow for urban extensions outside LDC boundaries assist in meeting cross boundary needs, meet needs close to where they arise, wide range of types and tenures, delivery green infrastructure, community sporting facilities through urban extensions. Burntwood is one only two urban areas within the District recognises as a highly sustainable location for development. Whilst Lichfield City is identified as a Strategic Centre within the adopted LPS Burntwood is identified as another large town and second within the settlement hierarchy second to only Lichfield City. Bloor Homes consider that Burntwood should continue its role as a focus for sustainable development to 2026 and beyond.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1507	Bloor Homes (Pegasus NC)	24	Town & Key Rural Village Focused Development continuation of the spatial strategy in LPS 2015. Focus on main urban areas slightly reduced level than Option 1 and modest growth in rural settlements. Considered the appropriate option for housing growth to 2036 greater range of sustainable sites increase housing choice. Settlements identified suitable to remain key rural settlements - good level of services and facilities and accessibility to services in higher order settlements. But opportunity to update RSSS new evidence to categorise settlements, changes and new settlements could be added. Provide a range of housing types in sustainable locations in line with BSGS. Housing in these areas would help maintained services. Challenges highlighted, more likely greenfield leading green belt boundary changes. But should see this not as challenge LPR offers opportunity to re-examine settlement and Green Belt Boundaries. Consider allocating sites beyond such boundaries and that should be redefined as necessary through the LPR process. Burntwood one of two urban areas and is recognised as a highly sustainable location for development. Lichfield City identified as Strategic Centre within LPS, Burntwood is identified as another large town and second within the settlement hierarchy, second to only Lichfield City. Bloor Homes consider that the Distinction of development under this option should be proportionate to the sustainability credentials of each settlement. Therefore under this option Burntwood should continue its role as a focus for sustainable development to 2036 and beyond.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1508	FI Real Estate Management (DPP)	1	Consider timeframe appropriate.	Comments noted
SIO1509	Bloor Homes (Pegasus NC)	23	Town & Key Rural Village Focused Development continuation of the spatial strategy in LPS 2015. Focus on main urban areas slightly reduced level than Option 1 and modest growth in rural settlements. Considered the appropriate option for housing growth to 2036 greater range of sustainable sites increase housing choice. Settlements identified suitable to remain key rural settlements - good level of services and facilities and accessibility to services in higher order settlements. But opportunity to update RSSS new evidence to categorise settlements, changes and new settlements could be added. Provide a range of housing types in sustainable locations in line with BSGS. Housing in these areas would help maintained services. Challenges highlighted, more likely greenfield leading green belt boundary changes. But should see this not as challenge LPR offers opportunity to re-examine settlement and Green Belt Boundaries. Consider allocating sites beyond such boundaries and that should be redefined as necessary through the LPR process. Burntwood one of two urban areas and is recognised as a highly sustainable location for development. Lichfield City identified as Strategic Centre within LPS, Burntwood is identified as another large town and second within the settlement hierarchy, second to only Lichfield City. Bloor Homes consider that the Distinction of development under this option should be proportionate to the sustainability credentials of each settlement. Therefore under this option Burntwood should continue its role as a focus for sustainable development to 2036 and beyond.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1510	FI Real Estate Management (DPP)	2	Consider most of the existing evidence base is out of date and the Review needs to be based on a fully up to date and accurate evidence base. Keen that the evidence base relating to employment development is fully up to date, accurate, takes account of regional and local circumstances and related opportunities and takes cognisance of views and experiences of organisations which are directly involved in this sector such as FIREM who operate employment sites / floorspace in the District. This will ensure the Council is in the best possible position to fully understand and react to local circumstances and opportunities and grow an appropriate supply of employment land and floorspace in the right locations.	Consideration of employment land and economic evidence will be undertaken
SIO1511	Bloor Homes (Pegasus NC)	26	Dispersed Growth would be distributed across a wide range of settlements - considered those listed with identified settlement boundaries represent the most sustainable settlements within the District. Noted document makes reference to consideration of smaller settlements and hamlets vain Green Belt review. Welcomed also this approach should extend to all there Green Belt settlements listed under Options 1 and 2. Options has advantage of meeting housing need and support villages in isolation this option would represent the least sustainable option for growth. Combing other options with growth at some of the more sustainable smaller settlements may therefore would be a more suitable spatial strategy for the LPR. This option result in a minimal level of growth being focused in Burntwood which would result in a local y derived housing need not being met- undermine opportunities for investment including enlarged town centre. In isolation this options would undermine the ability of the local community to deliver their vision and objectives as set out in the emerging Burntwood NP.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

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SIO1512	Bloor Homes (Pegasus NC)	27	Dispersed Growth would be distributed across a wide range of settlements - considered those listed with identified settlement boundaries represent the most sustainable settlements within the District. Noted document makes reference to consideration of smaller settlements and hamlets in Green Belt review. Welcomed also this approach should extend to all these Green Belt settlements listed under Options 1 and 2. Options has advantage of meeting housing need and support villages in isolation this option would represent the least sustainable option for growth. Combining other options with growth at some of the more sustainable smaller settlements may therefore be a more suitable spatial strategy for the LPR. This option result in a minimal level of growth being focused in Burntwood which would result in a locally derived housing need not being met- undermine opportunities for investment including enlarged town centre. In isolation this options would undermine the ability of the local community to deliver their vision and objectives as set out in the emerging Burntwood NP.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1513	Bloor Homes (Pegasus NC)	28	New Settlement: Development would be focused in one or more new settlements with only a small amount of growth being focused to the key urban settlements including Burntwood. The Scope Issues and Options documents identifies a number of opportunities and challenges with this option. Bloor Homes broadly agree but was considered previously by LDC in the LPS process and determined that the challenges outweighed opportunities. Delivery would require investment in infrastructure long lead in times 5-10 years uncertainty regarding market saturation not a considered appropriate solution in isolation. Growth Option 3 would result in minimal growth being focused in Burntwood result in locally derived housing need not being met within the town and would undermine opportunities for investment in services and facilities. In isolation this options would undermine the ability of the local community to deliver their Vision and Objectives as set out in the emerging Burntwood NP.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1514	FI Real Estate Management (DPP)	3	Approach to operate a partnership working approach would be supported if the invite extends to the private sector and organisations like FIREM. The vision and priorities of the Council's Strategic Plan need to be aligned to the review. Supports the that the Council intends to work with SCC, neighbouring authorities and a wide range of statutory advisory bodies. As key issue for FIREM is the extent of and justification, that is the lack of it, for some areas of Green Belt in the District. As such, and as part of considering where the unmet needs of the HMA might best be met, FIREM supports a Greater Birmingham Strategic Growth Study, assuming this incorporates a strategic Green Belt Review. FIREM is very keen that this Review assesses whether land currently zoned as Green Belt fulfils the purposes of including land in Green Belt as defined through national planning policy. And if not the Review should be used as the basis to launch the deallocation of areas that don't satisfy policy. In FIREM's view this will be a key strategic piece of evidence that will need to feed into the Local Plan Review. Supports that a localised Green Belt Review document will be needed and FIREM are keen to be involved in the process.	Comments noted
SIO1515	Bloor Homes (Pegasus NC)	29	New Settlement: Development would be focused in one or more new settlements with only a small amount of growth being focused to the key urban settlements including Burntwood. The Scope Issues and Options documents identifies a number of opportunities and challenges with this option. Bloor Homes broadly agree but was considered previously by LDC in the LPS process and determined that the challenges outweighed opportunities. Delivery would require investment in infrastructure long lead in times 5-10 years uncertainty regarding market saturation not a considered appropriate solution in isolation. Growth Option 3 would result in minimal growth being focused in Burntwood result in locally derived housing need not being met within the town and would undermine opportunities for investment in services and facilities. In isolation this options would undermine the ability of the local community to deliver their Vision and Objectives as set out in the emerging Burntwood NP.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1516	Bloor Homes (Pegasus NC)	37	<p>Spatial Strategy needs to be consistent with Strategic Priorities to enable Visions. Retaining Vision and approach in LP it therefore follows that the spatial strategy within LPR should focus on main centres and key settlements. The strategy should include cross boundary needs Rugeley Tamworth and GBMA may result in other strategic locations.</p> <p>Further development in high order smaller settlements should be identified preferred options should be a combination of Options 1 and 2 and include some elements of Option 3. Land at Coulter Lane Burntwood Bloor homes 27.3 hectares north east Burntwood SHLAA July 2017 ref 494 907 1123 further submissions 'Call for Sites' and LPA process. Proposals set out in Prom Document includes technical environmental master planning for land both to the east and west of Coulter Lane Burntwood. In summary</p> <p>Land West of Coulter Lane, 22.8 hectares 400 dwellings 37dph, vehicular access 2x Church Road 1 restricted access Coulter Lane, hierarchy of street tree lined secondary shared surface tertiary lanes and drives respect landform provide views key focal points. pedestrian and cycle routes including potential link to Fulfren primary school, housing mix - Policy H1, low density development along outer edges, new green spaces retention of existing landscape features provision of new Green Belt boundary to the north side using physical landscape features.</p> <p>Land East of Coulter Lane 4.5 hectares 80 dwellings medium density 2x vehicular access off Coulter Lane Mix H1 urban edge strong boundary with Coulter lane, public open space, provision of new green belt boundary to the north of the site using physical landscape features. Refined following further technical environmental and design work.</p> <p>Benefits of Development logical modest extension to Burntwood 480 homes range of homes opportunity to assist in addressing the following. Temporary employment supported by the construction phase. Contribution of the construction phase to economic output, Growing labour force, household spend, Increased Council Tax income, CIL Receipts, affordable housing delivery. Benefits are aligned to objectives Burntwood NP. Aligned with Residential Growth Option 1 Town Focused Development and residential Growth Option 2 two options are best place to deliver the strategic proximities which the council consider will remain broadly relevant for the review process. Land at Coulter Lane will assist in, sustainability of existing urban settlement of Burntwood, improved infrastructure for new and existing communities, improved transport (gap at Boney Hay in existing service), range of homes, supported improved enlarged town centre, improving outdoor indoor leisure and cultural facilities, high quality development within a highly sustainable location.</p> <p>Current Green Belt evidence land at Coulter Lane would ensure any Green Belt release only includes land that plays a moderate role against purposes. Currently review considers specific parcels around sustainable settlements - Burntwood. Review assessment against five purposes. Burntwood 9 parcels identified excluding SSSI and Chasewater. Concluded 8 of 9 parcels assessed as important against at least one of the NPPF purposes - exception Burntwood east 1 assessed as moderate in "assisting in safeguarding the countryside from encroachment and maintain the local settlement pattern and hierarchy. Burntwood east 1 = land in Bloor's control and subject to this rep. The Landscape and Visual Constraints and Opportunities report (Appendix 2) complement the existing Green Belt evidence. Endorse LDC Green Evidence = site does not perform an important role in respect of Green Belt. LDC committed to further green Belt review considered published conclusions in respect of Land at Coulter Lane Parcel East 1 are not likely to change - represents the most appropriate location for removing land from the Green Belt in Burntwood.</p> <p>Deliverability Medium density 480 dwellings yield recognises current strong demand for 2 and 3 bed. SHLAA 2017 Land to the east and west are suitable for development. Concerns raised in SHLAA address in rep and Promotional Document. Local Highway network - Land west Coulter Lane 2 accesses Church Road 300 dwellings no direct frontage access, Coulter Lane 100 dwellings. Assessment on 8 junctions completed - a number likely to require improvement. Options section 6 of Promotional Document considered further in Transport Assessment to be submitted with any future application. SHLAA - watercourse passes through site which may have associated floodplain. Section 8 Promotional Document no development in FZ. D Surface water routes considered no development within these areas Section 9 Promotional Document. Grade 2-3 ag land loss of 27 ha ag land need for development would outweigh the loss. Site available, achievability - SHLAA impact measures to mitigate the local highway impact are unlikely to make the site unviable. Transportation work will be undertaken to agree any necessary mitigation. The site is suitable available and residential development is achievable such that the site is capable of delivering in full prior to 2036. Summary Coulter Lane Burntwood is a suitable and sustainable location of residential development and represents a derivable proposition being available now and providing every prospect that a significant number of dwellings can be delivered. The suitability of the site is fully detailed within the accompanying Promotional Document.</p>	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1517	FI Real Estate Management (DPP)	4	<p>Agree the quantum of economic growth planned for development and use within the District will need to be considered as part of the review process and agrees this needs to be aligned to residential growth as they are related.</p> <p>Supports the approach and related and is keen to seek acknowledgement from the Council that it will take account the potential of existing employment sites like Drayton Manor Business Park to be improved and expanded given its sustainability credentials. The review needs to cover a range of new policies and related land allocations which link to the need for comprehensive review of Green Belt at strategic and local levels.</p> <p>In summary a tranche of policies on employment land and premises need to be formulated.</p>	The focus for employment growth will be considered through the Review process
SIO1518	FI Real Estate Management (DPP)	5	See response to Q4	See response to Q4

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1519	FI Real Estate Management (DPP)	6	See response to Q4	See response to Q4
SIO1520	FI Real Estate Management (DPP)	7	See response to Q4. Suggests that once the NPPF is published, this question is revised by the Council to ensure that anything new or not covered in the current version of the NPPF is covered in the review through appropriately worded new policies.	See response to Q4
SIO1521	FI Real Estate Management (DPP)	8	Agree many of the issues remain relevant. Issue 4 - noted the need and importance of the Council identifying and including plans, policies and allocation in the review that benefit existing major sites of employment like Drayton Manor Business Park. This should be identified through this issue or a new one identified to cover the topic - i.e. need to make best use of existing developed sites like the business park which offer planning benefits over other options for providing new employment land and floorspace. Issue 7 - the District needs a range of sites and premises available for employment use. Current trend for new employment facilities in connect with major logistics parks and distribution facilities near motorway junctions but these tend to deliver low levels of employment. There remains a demand a for less high profile but still good quality employment floorspace which needs to offer flexibility as to how it can be used. Issue 8 & 14 comments are linked. Planning should attempt to deliver sustainable patterns of development which extend to making sure areas of employment are close to or within easy reach of areas of residential and by sustainable means of transport. Drayton Manor Business Park is located close to Fazeley. Fazeley offers scope to grown and expand and so does Drayton Manor Business Park, if Green Belt affecting it were to be drawn back. Surprised the Review doesn't make any reference to the effects of Brexit.	The employment site in questions and its policy footing has been requested by FI Real Estate to be heard at the Local Plan Allocations EIP. The conclusion of this will have a bearing upon the Review.
SIO1522	Richborough Estates Fazeley (Pegasus NC)	Whole Document	Pegasus Group on behalf of Richborough Estates rep relates to land at Plantation Lane Fazeley read in conjunction with Site Location Plan/Illustrative Concept Masterplan - support allocations of land. Rep framed in context of requirements NPPF para 182. Planning Policy Context Supports review opportunity to review vision strategic objectives development requirements, spatial development strategy and policies. In line with emerging NPPF undertake a review at least every five years. Ensure up to date local plan for the District. Scope Issues and Options consultation highlights a number of key changes - unmet housing need in GBHMA and opportunity to align with revised NPPF. Richborough support review process this representation expresses the following comments in respect of the scope and process outlined in the questions.	The site is outside the current village boundary. The settlement is not considered to be a sustainable settlement in the adopted Local Plan Strategy and it has not been demonstrated how the development of the site would contribute to sustainable communities. Within Green Belt. Does not wholly comply with current development plan policies in the Local Plan. Unlikely to be considered acceptable from a strategic policy perspective in light of location. Site is within mineral safeguarding area. Is within 1000m of SBI and ancient woodland. Loss of Grade 3 agricultural land may need justification. Site has potential for protected species and hedgerows. Support for Review noted.
SIO1523	Richborough Estates Fazeley (Pegasus NC)	1	Noted adoption anticipated 2020 plan period 2020-2036 = 16 year timeframe. Considered appropriate and in line with para 157 NPPF and stance of draft NPPF. Plan period will aligned with GBHMA SGS Feb 2018 which considers housing need - time frame 2036.	Comments noted

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1524	Richborough Estates Fazeley (Pegasus NC)	2	<p>In light of NPPF requirements the following should be updated. Green Belt LDC 4 Pieces of Green Belt Evidence most recent July 2017. LPR documents refers to the Green Belt review as considering "whether there is any specific requirements to amend existing Green Belt boundaries to meet local rather than strategic need." LPR committed to consider GBBC HMA need consider Green Belt evidence review to address such strategic need. Review in line with NPPF para 135 = strategic Green Belt Study. LPA Supplementary Green Belt report 2016 assess parcels of land around Lichfield, Burntwood, Key Rural Settlements - identified smaller sites to be considered for removed from Green Belt to meet housing need in LPS. So the removal of these sites and other should be considered through evidence review justify LPR. Para 1.30 of Scope Issues and Options anticipates further local Green Belt documents also referred to in Appendix A. Housing SSD Housing Needs Study and SHMA 2012 (six years ago) included LDC TBC and CCD report considered demographic housing economic trends date from 2012 based sub national household projections. More recent data 2014 available and it is considered that if national planning policy remains as drafted SHMA should be refreshed in line with latest projections. Also 2016 based data will be published in summer 2018 once available should be used as a baseline for future housing growth. Housing White Paper and Planning for the Right Homes in the Right Places proposed standard Methodology for dwellings requirements if in revised NPPF (July) appropriate to use standard approach. 2014 projections LDC 2016-2026 + 275 households per annum. 2016 affordability ratio 8 + uplift of 24% = further 65 dwellings. Total dwelling requirements 340 per annum. But 2017 affordability ratio 8.5 = 78 dwelling uplift = 353 dwelling per annum. Dwelling requirement likely to change once 2016 population household projection published later in year. Comparing SHMA 410 dwellings and Standard Methodology 353 dwellings clear figures by the new methodology are lower. Due to use of earlier household projections - SHMA identified number of scenarios concluded dwelling requirement of 410 and 450. Standard Methodology only considers latest population projections no affordability ratio, no account for many factor previously considered to ensure housing is aligned with economic aspirations. Recommend further testing of standard methodology to ensure dwelling requires robust to 2036. Work with LEPS understand economic growth and align housing. LDC falls under GBBC HMA acknowledged that some authorities are unable to meet need LDC play a role Duty to Corporate to help met shortfall. Lichfield close to Birmingham and BC and strong functional relationship between the conurbation and settlements in LDC suitable and sustainable locations for growth to assist issue. SHousing needs Study appraised affordable housing partial update in earlier SHMA prior to 2012 now out of date Dynamic model based on Affordable Housing Viability Assessment 2012 needs refreshing. Rural Settlement Sustainability Study (RSSS) published 2016 to inform LPA requires updating review is strategic. Review may result in amendments in hierarchy of settlements should recognise that Fazeley/Mile Oak/Bonehill includes a range of services and facilities and residents have access to a regular public transport service. As such Fazeley/Mile Oak/Bonehill is one of the most sustainable settlements within Lichfield District. CCSAC review published in 2017 checked SAMMM still fit for purpose. Review concludes approach fit for current plan but some aspects should be focus of full review to a more comprehensive strategy in future - support and also evidence gathering to inform stage 2 of HRA. Also the following out of date Impact of Recreation to the CCSAC 2012 visitor impact mitigation strategy March 2010 Visitor Survey Feb 2013 review should inform amendments to Policy NR7 LPS 2015 that can be carried through into the LPR. Infrastructure IDP living Document number of evidence base studies require updating to assess emerging spatial options for LPR Draft Integrated transport Strategy 2011, indoor sports recreation playing pitches health and well-being air quality biodiversity renewable and low carbon energy water resources and supply. IDP March 2018 infrastructure aspirations for Fazeley – Environmental Improvements, provision of amenity green space, projects tackle anti- social behaviour , 4 football pitches, improvements to canals towpaths, possible health facilities. Viability LDC evidence base does not include a Local Plan Viability Assessment, requirement NPPF para 174 Of particular note is the NPPF's guidance that, "In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle", and that, "the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened". 2.31 It is therefore considered of paramount importance that a Viability Assessment is undertaken alongside the Local Plan Review.</p>	<p>Comments noted, consideration of a Green Belt Review will be undertaken</p> <p>Consideration to undertaking a HEDNA will be undertaken</p>
SIO1525	FI Real Estate Management (DPP)	9	<p>Although a number of broad objectives set out in the current vision remain relevant, the vision in parts is overly aspirational and includes statements that aren't necessary given the key purpose of the plan and in parts it needs to be clearer and more specific on how key growth and economic development objectives will be delivered. Suggests wording for the vision</p>	<p>Comments noted, a review of the visions' reference to employment growth will be undertaken</p>
SIO1526	FI Real Estate Management (DPP)	10	<p>Agree that the objectives remain broadly relevant but may need to be amended to reflect changed policy priorities and other aspirations that will fall out of the review process.</p> <p>Suggest changes to Strategic Objective 7 and 8:</p> <p>7 - Economic Prosperity: To promote economic growth and prosperity by supporting measures and initiatives that enable the local economy to grow and adapt to changing economic circumstances and to make the most of existing and newly arising economic opportunities.</p> <p>8 - Employment Opportunities: To ensure that employment opportunities within the District are created through making the best use of existing developments and facilities and to complement these the development of floorspace and facilities to support new enterprises and so as to support and growth and diversification of existing businesses, so as to support the sustainable growth of the District and meet the needs of its communities.</p>	<p>Comments noted updates to these priorities will be considered</p>

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1527	FI Real Estate Management (DPP)	11	No, such policies can be overly prescriptive and it is better that each site and the potential it offers for development is treated on a site by site basis and any proposed developments on their merits. If such a policy has to be included then it should be strategic in basis and designed to inform developers about the Council's desire that schemes should generally be capable of delivering densities at the medium to high end of the scale so as to maximise development opportunities	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO1528	Richborough Estates Fazeley (Pegasus NC)	3	LDC Identify a number of issues to consider under Duty to Co-operate. Unmet housing needs of the GB HMA council commitment to engage including Tamworth Housing needs. Concerns how housing shortfall will be addressed across HMA in a timely manner. Standard Methodology for housing needs sets a minimum figure, does not consider other factors, LDC overall housing figure for LPR due to proximity of neighbours with unmet need should reflect strategic cross boundary housing needs = far higher number than Standard mythology. GL Hearn report identifies minimum shortfall of 60,855.	Comments noted
SIO1529	FI Real Estate Management (DPP)	12	Yes. Overall the proposed strategy in the Local Plan has served the District well and is supported in the context of the broader principles of it. With regards to employment growth, FIREM notes benefits of directly a large part of growth to main centres and other sites and is surprised that the strategy ignores Drayton Manor Business Park. This is a major existing employment site which offers considerable potential to be improved and expanded subject to a change in how it is designated in policy terms. It is located in Fazeley and going forward Fazeley continues to offer considerable potential for ongoing growth in housing and new growth in employment, creating an even more sustainable settlement.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy and quantum for growth including employment growth. This will be informed by a range of evidence.
SIO1530	Richborough Estates Fazeley (Pegasus NC)	4	Agree	Comments noted
SIO1531	Richborough Estates Fazeley (Pegasus NC)	5	Agree with Table 1.3 but several other also require minor amendments to either bring them into line with current national policy or update them in the light of further evidence. Core Policy 8: Our Centres and may necessitate changes to the Hierarchy of centres. Policy E1 Retail Assessment identification of further development at Burntwood could increase the relevant floorspace need to help support the delivery of an improved town centre.	The revised NPPF will need to be considered through the Local Plan Review process Comments noted, policy CP 8 and E1 will be considered through the Review.
SIO1532	Richborough Estates Fazeley (Pegasus NC)	6	Policy Burntwood 5 is now considered to be out of date as the development is almost built out. Policy East of Rugeley is now out-of-date and requires amending accordingly. Policy North of Tamworth may require amendment through the review process as this plan approval places a number of conditions which could restrict delivery. Policy East of Rugeley mixed use development 1130 dwellings in line with Appendix G LPS however includes Borrow Pit but Policy R1 LPA retains this features therefore no longer deliver 450 therefore policy East of Rugeley out of date.	Comments noted, the location of new growth will need to be considered during the Review
SIO1533	Richborough Estates Fazeley (Pegasus NC)	7	Additional policies trigger for review of plan should be included. Reserve sites should be identified. Consideration to safeguarding land in order for Green Belt sites on settlement edges may be brought forward if required. This is supported by NPPF and Draft NPPF - Green Belt should be identified in Local Plans in order to meet longer term development needs stretching well beyond the Plan period.	A review trigger would only be necessary were there something specific that might trigger a review ahead of the NPPF 5 year review timetable The need for safeguarding land would need to be established in the Review. However it is currently considered to produce a Plan that does not necessitate the need for safeguarding
SIO1534	Richborough Estates Fazeley (Pegasus NC)	Whole Document	Existing issues the vision and SP are set out in LPS 2015. Agree that these will remain broadly relevant as a starting point for LPR.	Comments noted.
SIO1535	Richborough Estates Fazeley (Pegasus NC)	8	Table 3.1 reads more like a set of objectives with only number 2, 3 and 9 setting out issues to be addressed.	Comments noted a review of the objectives and there delivery will be undertaken
SIO1536	Richborough Estates Fazeley (Pegasus NC)	9	Vision and approach remain relevant and is supported. But consider vision should be more ambitious opportunities in District and wider areas H52 and common wealth games.	Comments noted sub-regional, regional and national initiatives will need to be assessed to identify whether there is scope to incorporate within the vision
SIO1537	Richborough Estates Fazeley (Pegasus NC)	10	Majority of Strategic priorities are considered broadly relevant SP 6 refer only to the needs of Lichfield. It should be amended to also refer to BBGMA and identified as issue 1 within the consultation document and referred to under the previous response to question 2 of this consultation. Levels of Growth Chapter 6 states "different types and levels of growth that will need to be considered and potentially accommodated through the LPR process" but significant level of growth will relate to GBHMA. No indication of the proportion of identified unmet need will be considered through the review process. Understand co-operate with LPA and GBHMA other areas North Warwickshire and Solihull have identified a quantities commitment. Accepted GBHMA identifies a range of strategic growth options and the LPR should consider all relevant further options that could boost housing supply in District.	The Review does include reference to the GBHMA shortfall. However it is recognised that the Plan Review will need to deal with cross boundary issues
SIO1538	Richborough Estates Fazeley (Pegasus NC)	17	Lichfield Centres Study published 2017 recent but LPR will span 2020-2026 consider evidence updated following completion of Friargate and Lichfield City Centre and Mill Green Designer Outlet Village CCD which is under construction. Once above factors resolved better informed the retail and office requirements for the purpose of the LPR	Comments noted. This will be considered further as the Local Plan Review progresses.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1539	Richborough Estates Fazeley (Pegasus NC)	11	NPPF advises LA to set own approach to housing density to reflect local circumstance. Draft NPPF advises anticipated shortage of housing LA to use minimum density standard for city and town centres and other locations that are well served by Transport, and those standards should seek uplift in average density of residential development in those areas unless strong reasons why this would be inappropriate, also notes could set a range of densities that reflect the accessibility and potential of different areas. LDC is a diverse in density, if density standards are incorporated in LPR should be minimum making reference to character of the local areas and the housing mix determined by local need. May require a variety of densities.	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO1540	Richborough Estates Fazeley (Pegasus NC)	12	LPR identifies unmet shortfall from GBHMA and element to fall to Lichfield to be delivered. DC should assist in meeting these unmet needs through identifying additional land for development in sustainable location and in making best use of existing infrastructure in sustainable locations with strong links to the conurbation. Could require a range of development options in a range of settlements. Also consider benefits to the District, unlocking government funding for economic growth, LEPS.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield.
SIO1541	Richborough Estates Fazeley (Pegasus NC)	13	Priority of Government is to boost housing by a variety of means Self build and custom build identified as one method. NPPF and draft NPPF give explicit support to policies with plan for mix of housing, including self commissioning. Para 159 NPPF sets LPA duty to assess local demand for self-build plots and provision for such demand.	Comments noted
SIO1542	Richborough Estates Fazeley (Pegasus NC)	14	LPS undertake a strategic review of land within their ownership to identify smaller plots and sites. Planning briefs to provide certainty. Recognised not always suitable as not all LPS have large land holdings.	Comments noted. This will be considered further as the Local Plan Review progresses and will be informed by a range of evidence.
SIO1543	FI Real Estate Management (DPP)	14	Development plans should not be so prescriptive with regard to this matter, which is best left to natural / market forces to determine.	Comments noted. This will be considered further as the Local Plan Review progresses and will be informed by a range of evidence.
SIO1544	FI Real Estate Management (DPP)	17	Yes on the premise that Lichfield is the main centre of the District and therefore the one that should be the focus for retail and related town centre uses. One issue is further consideration needs to be given to whether it is the best centre for all new office development.	Comments noted. This will be considered further as the Local Plan Review progresses.
SIO1545	FI Real Estate Management (DPP)	18	AAPs & SPDs subject to form content and level of detail can assist development and the Council therefore broadly supportive of this approach.	Comments noted
SIO1546	FI Real Estate Management (DPP)	19	Development plans ignore anything other than the main forms of development. The review would benefit from policies dealing with specialist forms of housing, education and sui generis uses.	Comments noted
SIO1547	FI Real Estate Management (DPP)	20	See Q19	Comments noted
SIO1548	FI Real Estate Management (DPP)	21	See some benefits in this approach as this option would see the majority of growth directed towards major settlements within and adjacent the District. Ideally most growth would be delivered within existing urban areas which the emphasis on the re-use of brownfield sites. Question the wisdom of Lichfield and Burntwood receiving the largest allocation of future growth, as the search for suitable sites and opportunities should be widened as there are other opportunities that could deliver fully planned, sustainable and deliverable urban extension options, one being at Drayton Manor Business Park. Overall consider this option has some merit but could be improved if merged or considered alongside Option 2.	Comments noted.
SIO1549	FI Real Estate Management (DPP)	22	See some benefits in this approach as this option would see the majority of growth directed towards major settlements within and adjacent the District. Ideally most growth would be delivered within existing urban areas which the emphasis on the re-use of brownfield sites. Question the wisdom of Lichfield and Burntwood receiving the largest allocation of future growth, as the search for suitable sites and opportunities should be widened as there are other opportunities that could deliver fully planned, sustainable and deliverable urban extension options, one being at Drayton Manor Business Park. Overall consider this option has some merit but could be improved if merged or considered alongside Option 2.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1550	FI Real Estate Management (DPP)	23	Acknowledge the attraction of this option is that it would take a similar format to option 1. Consider Fazeley offers the best potential to be sustainably expanded in a way that would see new housing and employment developments. Agree there should be limited development in other smaller, settlements and rural areas outside the hierarchy of key settlements. Consider the assessment of sustainability of rural settlements remains valid and supports the identification of key rural settlements. This option could incorporate elements of options considered in the Birmingham Strategic Growth Study. Consider the full extent of Green Belt in Fazeley, particularly at the Business Park cannot be justified and should be a key focus of any review of Green Belt.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1551	FI Real Estate Management (DPP)	24	Acknowledge the attraction of this option is that it would take a similar format to option 1. Consider Fazeley offers the best potential to be sustainably expanded in a way that would see new housing and employment developments. Agree there should be limited development in other smaller, settlements and rural areas outside the hierarchy of key settlements. Consider the assessment of sustainability of rural settlements remains valid and supports the identification of key rural settlements. This option could incorporate elements of options considered in the Birmingham Strategic Growth Study. Consider the full extent of Green Belt in Fazeley, particularly at the Business Park cannot be justified and should be a key focus of any review of Green Belt.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO1552	FI Real Estate Management (DPP)	25	Acknowledge the attraction of this option is that it would take a similar format to option 1. Consider Fazeley offers the best potential to be sustainably expanded in a way that would see new housing and employment developments. Agree there should be limited development in other smaller, settlements and rural areas outside the hierarchy of key settlements. Consider the assessment of sustainability of rural settlements remains valid and supports the identification of key rural settlements. This option could incorporate elements of options considered in the Birmingham Strategic Growth Study. Consider the full extent of Green Belt in Fazeley, particularly at the Business Park cannot be justified and should be a key focus of any review of Green Belt.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO1553	FI Real Estate Management (DPP)	26	Does not see this option to offer the same potential as Options 1 and 2, possibly combined. This option would see growth distributed across a wide range of settlements and some growth would be directed to unsustainable settlements and locations, including those that offer little scope to be upgraded in terms of their credentials.	Comments noted.
SIO1554	FI Real Estate Management (DPP)	27	Does not see this option to offer the same potential as Options 1 and 2, possibly combined. This option would see growth distributed across a wide range of settlements and some growth would be directed to unsustainable settlements and locations, including those that offer little scope to be upgraded in terms of their credentials.	Comments noted.
SIO1555	FI Real Estate Management (DPP)	28	The construction of a new settlement is a significant undertaking, there will be a significant amount and cost of infrastructure required to make a new settlement sustainable. Less confident about the level of support that might be available to bring this forward and whether funding can be secured. Developers of such schemes look to maximise development of market not affordable housing given the high cost of infrastructure and only commit to provide related services and facilities once a substantial amount of new, market housing has been completed. Such schemes have long lead in times for delivery. This option could assist in dealing with unmet need arising from the GBHMA but are of the view that this also applies to option 1 and 2, including if combined, but they deliver on many other fronts.	Comments noted.
SIO1556	FI Real Estate Management (DPP)	29	The construction of a new settlement is a significant undertaking, there will be a significant amount and cost of infrastructure required to make a new settlement sustainable. Less confident about the level of support that might be available to bring this forward and whether funding can be secured. Developers of such schemes look to maximise development of market not affordable housing given the high cost of infrastructure and only commit to provide related services and facilities once a substantial amount of new, market housing has been completed. Such schemes have long lead in times for delivery. This option could assist in dealing with unmet need arising from the GBHMA but are of the view that this also applies to option 1 and 2, including if combined, but they deliver on many other fronts.	Comments noted.
SIO1557	FI Real Estate Management (DPP)	30	The construction of a new settlement is a significant undertaking, there will be a significant amount and cost of infrastructure required to make a new settlement sustainable. Less confident about the level of support that might be available to bring this forward and whether funding can be secured. Developers of such schemes look to maximise development of market not affordable housing given the high cost of infrastructure and only commit to provide related services and facilities once a substantial amount of new, market housing has been completed. Such schemes have long lead in times for delivery. This option could assist in dealing with unmet need arising from the GBHMA but are of the view that this also applies to option 1 and 2, including if combined, but they deliver on many other fronts.	Comments noted.
SIO1558	FI Real Estate Management (DPP)	31	One of the key employment sites in Fazeley, Drayton Manor Business Park benefits from no policy support whatsoever. It exists and operates despite an unhelpful policy allocation which is counter intuitive and at odds with the strategic objectives of the adopted local plan. Whilst FIREM support this option as it would see employment development focused on existing employment / industrial areas that are located across the District, this is only if it is on the basis of a full policy review, including Green Belt, and the facility attracts a new employment type allocation or policy, possible as part of a planned urban extension initiative. Questions the veracity of the ELAA given it appears to omit Drayton Manor Business Park which is a significant employment resource.	The spatial strategy does not prioritise altering Green Belt boundary here, although it is acknowledged that it is a constraint. Consequently, an urban extension here would be counter intuitive, especially given the strengthened Green Belt Policy in the Revised NPPF requiring "considerable evidence".

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1559	FI Real Estate Management (DPP)	32	One of the key employment sites in Fazeley, Drayton Manor Business Park benefits from no policy support whatsoever. It exists and operates despite an unhelpful policy allocation which is counter intuitive and at odds with the strategic objectives of the adopted local plan. Whilst FIREM support this option as it would see employment development focused on existing employment / industrial areas that are located across the District, this is only if it is on the basis of a full policy review, including Green Belt, and the facility attracts a new employment type allocation or policy, possible as part of a planned urban extension initiative. Questions the veracity of the ELAA given it appears to omit Drayton Manor Business Park which is a significant employment resource.	see response to reference SIO1558
SIO1560	FI Real Estate Management (DPP)	33	One of the key employment sites in Fazeley, Drayton Manor Business Park benefits from no policy support whatsoever. It exists and operates despite an unhelpful policy allocation which is counter intuitive and at odds with the strategic objectives of the adopted local plan. Whilst FIREM support this option as it would see employment development focused on existing employment / industrial areas that are located across the District, this is only if it is on the basis of a full policy review, including Green Belt, and the facility attracts a new employment type allocation or policy, possible as part of a planned urban extension initiative. Questions the veracity of the ELAA given it appears to omit Drayton Manor Business Park which is a significant employment resource.	See response to representation SIO1559
SIO1561	FI Real Estate Management (DPP)	34	Whilst FIREM wouldn't rule new sites and employment land / development opportunities being brought forward through the review, it is of the view that the best and most obvious opportunities to secure growth in employment is through building on the potential already established through existing sites and developments and by looking to expand them. This creates economies of scale and provides greater scope for sustainable development to be created, particularly where this can be coupled with planned and coordinated expansion in terms of new housing, possibly through a fully planned urban extension project.	Comments noted.
SIO1562	FI Real Estate Management (DPP)	35	Whilst FIREM wouldn't rule new sites and employment land / development opportunities being brought forward through the review, it is of the view that the best and most obvious opportunities to secure growth in employment is through building on the potential already established through existing sites and developments and by looking to expand them. This creates economies of scale and provides greater scope for sustainable development to be created, particularly where this can be coupled with planned and coordinated expansion in terms of new housing, possibly through a fully planned urban extension project.	Comments noted. The Local Plan will be supported by a range of evidence, this will include evidence relating to employment/commercial growth.
SIO1563	FI Real Estate Management (DPP)	36	Whilst FIREM wouldn't rule new sites and employment land / development opportunities being brought forward through the review, it is of the view that the best and most obvious opportunities to secure growth in employment is through building on the potential already established through existing sites and developments and by looking to expand them. This creates economies of scale and provides greater scope for sustainable development to be created, particularly where this can be coupled with planned and coordinated expansion in terms of new housing, possibly through a fully planned urban extension project.	Comments noted. The Local Plan will be supported by a range of evidence, this will include evidence relating to employment/commercial growth.
SIO1564	FI Real Estate Management (DPP)	37	A combination of housing options 1 and 2 merged with employment option 1 provides the potential for a complementary development initiative in the form of a planned urban extension at Fazeley focused on Drayton Manor Business Park and land around it.	Comments noted. The Local Plan will be supported by a range of evidence, this will include evidence relating to employment/commercial growth.
SIO1565	Richborough Estates Fazeley (Pegasus NC)	18	Not favoured a single comprehensive plan is preferred updated at least every five years. Minimise resource improve consistency and clarity.	Comments noted. The revised NPPF is due to be published summer 2018 and set out that Local Plan should be reviewed every 5 years.
SIO1566	Richborough Estates Fazeley (Pegasus NC)	19	LPR should also include policies and strategic allocations necessary to provide appropriate leisure, recreation infrastructure and community facilities.	Comments noted. Infrastructure provision will be considered as part of the testing of each option.
SIO1567	Richborough Estates Fazeley (Pegasus NC)	20	IDP will inform the new development strategy level of housing employment retail growth should be determined first. Richborough estates consider residential development focued in Fazeley/Mile Oak/Bonehill could assist in supporting and providing social physical green infrastructure in a timely manner - mitigate for development and delivery community objectives.	Comments noted. The District Council is committed to working with strategy providers, developers and other service providers to enable the sustainable development within the District.
SIO1568	Richborough Estates Fazeley (Pegasus NC)	Whole Document	Residential Growth Options Identification of broad strategic options could be considered alone or in combination as potential spatial strategies to deliver the growth requirements of the District is supported. These sour options reflect originally considered to inform development of LPS and broad enough to encompass the areas of search for GBHMA. Richborough Estates wish to express the following views in respect of the Residential Growth Options albeit they reserve the right to provide further views once the appropriate quantum of residential development has been identified.	Comments noted.
SIO1569	Richborough Estates Fazeley (Pegasus NC)	21	Residential Growth Option (Town Focused) benefits - re-using brownfield land utilising infrastructure, supporting existing services and facilities, high density where appropriate, allow for urban extensions outside LDC boundaries assist in meeting cross boundary needs, meet needs close to where they arise, wide range of types and tenures, delivery green infrastructure, community sporting facilities through urban extensions. However this option means other sustainable settlements Fazeley Mile Oak Bonehill experience a decline in population services. Town focused growth increase in pressure of services located in those settlement - therefore Green Belt release on edge of settlements e.g. Fazeley/Mile Oak/Bonehill to provide long term options for housing and employment will alleviate pressure within existing urban areas.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1570	Richborough Estates Fazeley (Pegasus NC)	22	Residential Growth Option (Town Focused) benefits - re-using brownfield land utilising infrastructure, supporting existing services and facilities, high density where appropriate, allow for urban extensions outside LDC boundaries assist in meeting cross boundary needs, meet needs close to where they arise, wide range of types and tenures, delivery green infrastructure, community sporting facilities through urban extensions. However this option means other sustainable settlements Fazeley Mile Oak Bonehill experience a decline in population services. Town focused growth increase in pressure of services located in those settlement - therefore Green Belt release on edge of settlements e.g. Fazeley/Mile Oak/Bonehill to provide long term options for housing and employment will alleviate pressure within existing urban areas.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1571	Richborough Estates Fazeley (Pegasus NC)	23	Town & Key Rural Village Focused Development continuation of the spatial strategy in LPS 2015. Focus on main urban areas slightly reduced level than Option 1 and modest growth in rural settlements. Considered the appropriate option for housing growth to 2036 greater range of sustainable sites increase housing choice. Settlements identified suitable to remain key rural settlements - good level of services and facilities and accessibility to services in higher order settlements. But opportunity to update RSSS new evidence to categorise settlements, changes and new settlements could be added. Provide a range of housing types in sustainable locations in line with BSGS. Housing in these areas would help maintained services. Challenges highlighted, more likely greenfield leading green belt boundary changes. But should see this not as challenge LPR offers opportunity to re-examine settlement and Green Belt Boundaries. Consider allocating sites beyond such boundaries and that should be redefined as necessary through the LPR process. Fazeley is one of a handful of sustainable villages within the District and is recognised as a highly sustainable location for development serving local residents and other outlier villages, Richborough Estates consider that the distribution of development under this option should be proportionate to the sustainability credentials of each settlement. Therefore under this option Fazeley should continue its role as a focus for sustainable rural growth to 2036 and beyond.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO1572	Richborough Estates Fazeley (Pegasus NC)	24	Town & Key Rural Village Focused Development continuation of the spatial strategy in LPS 2015. Focus on main urban areas slightly reduced level than Option 1 and modest growth in rural settlements. Considered the appropriate option for housing growth to 2036 greater range of sustainable sites increase housing choice. Settlements identified suitable to remain key rural settlements - good level of services and facilities and accessibility to services in higher order settlements. But opportunity to update RSSS new evidence to categorise settlements, changes and new settlements could be added. Provide a range of housing types in sustainable locations in line with BSGS. Housing in these areas would help maintained services. Challenges highlighted, more likely greenfield leading green belt boundary changes. But should see this not as challenge LPR offers opportunity to re-examine settlement and Green Belt Boundaries. Consider allocating sites beyond such boundaries and that should be redefined as necessary through the LPR process. Fazeley is one of a handful of sustainable villages within the District and is recognised as a highly sustainable location for development serving local residents and other outlier villages, Richborough Estates consider that the distribution of development under this option should be proportionate to the sustainability credentials of each settlement. Therefore under this option Fazeley should continue its role as a focus for sustainable rural growth to 2036 and beyond.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence. This evidence will include the progression of Green Belt review.
SIO1573	Richborough Estates Fazeley (Pegasus NC)	26	Dispersed Growth would be distributed across a wide range of settlements - considered those listed with identified settlement boundaries represent the most sustainable settlements within the District. Noted document makes reference to consideration of smaller settlements and hamlets vain Green Belt review. Welcomed also this approach should extend to all there Green Belt settlements listed under Options 1 and 2. Options has advantage of meeting housing need and support villages in isolation this option would represent the least sustainable option for growth. Combing other options with growth at some of the more sustainable smaller settlements may therefore would be a more suitable spatial strategy for the LPR. T	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1574	Richborough Estates Fazeley (Pegasus NC)	27	Dispersed Growth would be distributed across a wide range of settlements - considered those listed with identified settlement boundaries represent the most sustainable settlements within the District. Noted document makes reference to consideration of smaller settlements and hamlets vain Green Belt review. Welcomed also this approach should extend to all there Green Belt settlements listed under Options 1 and 2. Options has advantage of meeting housing need and support villages in isolation this option would represent the least sustainable option for growth. Combing other options with growth at some of the more sustainable smaller settlements may therefore would be a more suitable spatial strategy for the LPR. T	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1575	Richborough Estates Fazeley (Pegasus NC)	28	New Settlement: Development would be focused in one or more new settlements with only a small amount of growth being focused to the key urban settlements. The Scope Issues and Options documents identifies a number of opportunities and challenges with this option. Richborough Estates broadly agree but was considered previously by LDC in the LPS process and determined that the challenges outweighed opportunities. Delivery would require investment in infrastructure long lead in times 5-10 years uncertainty regarding market saturation not a considered appropriate solution in isolation. Council likely to fail Housing delivery test - delivery rate of 95% suggest a range of sites across District for resilience. Like Growth Option 3 option would result in no growth being focused to sustainable rural settlements which would result in locally derived need not being met. Fazeley/Mile Oak& Bonehill would undermine existing services and facilities relied upon by existing residents and smaller settlements.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1576	Richborough Estates Fazeley (Pegasus NC)	30	New Settlement: Development would be focused in one or more new settlements with only a small amount of growth being focused to the key urban settlements. The Scope Issues and Options documents identifies a number of opportunities and challenges with this option. Richborough Estates broadly agree but was considered previously by LDC in the LPS process and determined that the challenges outweighed opportunities. Delivery would require investment in infrastructure long lead in times 5-10 years uncertainty regarding market saturation not a considered appropriate solution in isolation. Council likely to fail Housing delivery test - delivery rate of 95% suggest a range of sites across District for resilience. Like Growth Option 3 option would result in no growth being focused to sustainable rural settlements which would result in locally derived need not being met. Fazeley/Mile Oak & Bonehill would undermine existing services and facilities relied upon by existing residents and smaller settlements.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1577	Richborough Estates Fazeley (Pegasus NC)	37	Considered Spatial Strategy needs to be consistent with vision and the Strategic priorities need to deliver vision? Retaining the vision and approach in LPS therefore spatial strategy of LPR should focus growth in main centres and key settlements. Should encompass cross boundary needs - Tamworth, Rugeley and GGHA. Development in high order smaller settlements should be identified. Preferred option continuation of option 2 some elements of Option 3. Land at Plantation Lane Fazeley. Rep related to Plantation Lane Bonehill Richborough Estates current interest - site Plan Appendix 1. Appendix 2 Illustrative concept red line appendix 1 land controlled by Richborough in addition the concept plan has indication of how the adjoining parcel could also be developed for housing in order to demonstrate how a comprehensive scheme could look across two sites. Design Principles, design - mirrors existing residential building line along Watling Street. Layout has also taken into account the Conservation Area. Series of development focal points located within the scheme streets orientated to public open space and public transport. Bungalows dwelling types bias towards 2 and 3 bed, small apartments. Development Quantum 2.34 hectares, developable area 1.32 hectares 35dph. Concept plan Richborough site is circa 82 units -46 on the adjacent site. Access via Plantation Lane. Streets safeguard access to adjacent site, access to which is Park Lane. Minimise hedgerow removal. Pedestrian connections via Watling Street maximise linkages to bus stop. Green Infrastructure low points SuDs. Existing tree and hedges retained other than road and footpath connections. Gardens large to address existing tree canopies. Local Play Area - open space 0.89 hectares including SuDs, adjacent site - 0.57 hectares, Occupancy of 2.5 persons minimum requirement 0.29 hectares for Richborough land and 0.16 for adjacent site. Both over provide as part of a holistic landscape led approach to development.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1578	Cooper Developments (Pegasus)	1	Promotes land off London Road, Lichfield Yes. The plan period would tie in with the Greater Birmingham HMA Strategic Growth Study. Believe there should be a policy commitment to review policies every 5 years to ensure the plan is kept up to date in accordance with new NPPF	Comments noted
SIO1579	Richborough Estates Fazeley (Pegasus NC)		Richborough estates support review of Local Plan. Existing issues facing Vision and Strategic Priorities reflect those established with current LPS, Richborough agree broadly remain the same. To deliver a Broadly consist vision and strategic priorities it will be necessary for Fazeley to accommodate future growth to consolidate sustainability of the villages and ensure local derived housing need is net support infrastructure. Residential Growth Options 2 so the option house closely reflects the existing Spatial Strategy. Richborough Estates consider that this option most appropriate but also benefits of allowing additional proportionate growth within a number of smaller yeast sustainable villages not currently identified as key rural settlements. Fazeley is a sustainable settlement handful of key rural settlements within the District should continue via updated settlement hierarchy within informs options. LPR opportunities to review Green Belt boundary Fazeley/Mile Oak Bonehill. To 2036 feely will need to retain a role in providing new homes to meet housing needs and shortfall GBMHA Existing Green Belt boundary tightly drawn around existing village envelope LPR provides an opportunity to review Green Belt enable housing and permanence of the boundary of the long term. Green Belt evidence produced by the LDC to date further evidence submitted as part of this rep highlights land at Plantation Lane Fazeley will not fundamentally undermine the purpose of the Green Belt in this area or in relation to this edge of Fazeley. land at Plantation Lane in control of Richborough Estates developable contribute to meeting housing needs within the village 82 dwellings no know constraints suitability of site detailed in section 6 of Rep. Supported by LDC own evidence to date. Support new development strategy that focuses development towards most sustainable locations including key rural villages under Option 2. Richborough Estates would welcome the opportunity to maintain a dialogue with the District Council through the process of reviewing the Local Plan.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1580	Cooper Developments (Pegasus)	2	<p>Promotes land off London Road, Lichfield</p> <p>NPPF and draft NPPF stance on local plans based on proportionate relevant up to date evidence. Following require updating Green Belt Review 2012 Green Belt Review Supplementary Report 2013 Green Belt Supplementary Report 2016 Supplementary Green Belt Report Addendum 2017 Recent report 2016-2017 prepared in contact of LPA, both acknowledge not comprehensive but supplement - consider minor amendments to meet housing requirement in LPS. Appendix A - Green Belt Review "whether there is any specific requirements to amend existing Green Belt boundaries to meet local rather than strategic needs" in light of GBBC HMA - comprehensive review required to meet strategic need and completed in line with draft NPPF guidance. Land off London Road and the land south of Lichfield surrounding the SDA has not been assessed. Any future Green Belt assessment must consider this location.</p> <p>Housing Important once the 2016 based vintage of population and household projection data is published it is used as the baseline upon which future housing growth is identified. If the revised NPPF includes Standard Methodology then it will be appropriate for the local planning authority to consider the dwelling requirement. It is recommended further sensitivity testing of the Standard Methodology us undertaken to ensure the dwelling requirements are sufficient to meet local economic and social objectives. Need to work with the LEP to understand the level of growth the District is aiming to achieve and understand the implications for housing growth. Considered the primary evidence base in relation to affordable housing needs refreshing.</p> <p>Rural Settlement Sustainability Study: This captures a moment in time and in some settlements new services and facilities have been provided and scoring will have changed. This may result in necessitating further consideration of amendments to the hierarchy of settlements within the Council's spatial strategy for the review.</p> <p>Cannock Chase SAC: Supportive of approach and recommendations made regarding evidence gathering to inform stage 2 of the review of evidence, relating to evidence needs for the review and associated plan level HRA.</p> <p>Infrastructure: Number of evidence base studies on infrastructure which require updating to assess the emerging spatial options for the review.</p> <p>Viability: Need for the evidence base to encompass a Local Plan Viability Assessment.</p>	<p>Comments noted, consideration of a Green Belt Review will be undertaken</p> <p>Consideration to undertaking a HEDNA will be undertaken</p>
SIO1581	Cooper Developments (Pegasus)	3	<p>Key issues identified re Duty to Co-operate listed. In terms of unmet need of GBBC HMA - council stated commitment to engage with neighbours - including Tamworth (housing). Concerns on how housing unmet need will be met and in a timely manner. Noted application standard methodology for housing need assessment anticipated summer 2018 - sets out minimum figures affordability ratios does not take account of cross boundary needs . Lichfield overall figure for LPR given proximity of neighbouring authorities that cannot accommodate their housing needs should reflect strategic cross boundary housing needs and be a higher number than that set out in the DCLG standard Methodology.</p>	<p>Comments noted</p>
SIO1582	Cooper Developments (Pegasus)	4	<p>Promotes land off London Road Agree Table 2.1 policies listed require amendment or replacement. If LPA adopted pre LPR likely policies within LPR will also require amendment or replacement.</p>	<p>Comments noted</p>
SIO1583	Cooper Developments (Pegasus)	5	<p>Promotes land off London Road Agree with Table 1.3 but several other also require minor amendments to either bring them into line with current national policy or update them in the light of further evidence. Core Policy 8: Our Centres and Policy E1.</p>	<p>The revised NPPF will need to be considered through the Local Plan Review process</p> <p>Comments noted, policy CP 8 and E1 will be considered through the Review.</p>
SIO1584	Cooper Developments (Pegasus)	6	<p>Promotes land off London Road Policy Lichfield 5: East of Lichfield (Streethay) requires updating due to proposed additional housing site L2 200 dwellings should be included in Policy L5 and appendix D updating. Burntwood 5: east of Burntwood out of date development almost built, Appendix F remove. Policy North of Tamworth may require amendment or removal review informed by outcome of SofS decision. Policy East of Rugeley identified a mixed use development 1,130 dwellings in line with Appendix G. However SDA includes Borrow Pit but Policy R1 in LPA Focused Changes Borrow Pit to be retained. Therefore policy out of date requires amending.</p>	<p>The Arkall Farm Inquiry resulted in outline permission being granted.</p> <p>Comments noted, the location of new growth will need to be considered during the Review</p>

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1585	Cooper Developments (Pegasus)	7	Promotes land off London Road Trigger for further review of LP should be included. Draft NPPF five years. In the interest of continuous supply to meet identified needs considered reserve sites should be identified within the LP. Believe consideration to safeguarded land in order for Green Belt sites on the edge of settlements to be brought forward in the longer term should need arise. Para 85 and 138 state where necessary areas of safeguarded land between urban and Green belts areas should be identified in the LP in order to meet longer term development needs stretching beyond the plan period.	A review trigger would only be necessary were there something specific that might trigger a review ahead of the NPPF 5 year review timetable The need for safeguarding land would need to be established in the Review. However it is currently considered to produce a Plan that does not necessitate the need for safeguarding
SIO1586	Cooper Developments (Pegasus)	8	Promotes land off London Road Chapter 2 'Spatial Portrait' highlights the main issues facing the District considered Table 3.1 reads more like a set of objectives numbers 2, 3, 9 setting out issues to be addressed. Further consideration required.	Comments noted a review of the objectives and there delivery will be undertaken
SIO1587	Cooper Developments (Pegasus)	9	Promotes land off London Road Vision and approach remain relevant and is supported. But consider vision should be more ambitious opportunities in District and wider areas H52 and common wealth games.	Comments noted sub-regional, regional and national initiatives will need to be assessed to identify whether there is scope to incorporate within the vision
SIO1588	Cooper Developments (Pegasus)	10	Promotes land off London Road Majority of Strategic priorities are considered bearily relevant SP 6 refer only to the needs of Lichfield. It should be amended to also refer to BBGMA and identified as issue 1 within the consultation document and referred to under the previous response to Q2.	The Review does include reference to the GBHMA shortfall. However it is recognised that the Plan Review will need to deal with cross boundary issues
SIO1589	Cooper Developments (Pegasus)	11	Promotes land off London Road Lichfield District is very diverse in terms of housing density and therefore if density standards are incorporated within the Local Plan Review, these should be minimum standards determined by reference to the character of the local area and the housing mix as determined by local needs. The Council may wish to consider a variety of density standards for different locations.	Comments noted. The GBHMA Strategic Growth Study recommends authorities across the HMA increase housing density. This will be considered further as the Local Plan review progresses.
SIO1590	Cooper Developments (Pegasus)	12	Promotes land off London Road Lichfield District should assist in meeting these unmet housing needs through identifying additional land for development in sustainable locations and in making best use of existing infrastructure in locations near to the conurbation. In assisting with meeting these needs the Council should also give consideration to potential benefits that could be delivered for the District, such as unlocking Government funding for growth and aligning future development with their economic aspirations in delivering the Council's and the LEP objectives	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. The District Council will continue to work with neighbouring authorities through the Duty to Cooperate to establish the appropriate level of housing arising from the HMA shortfall to be delivered within Lichfield.
SIO1591	Cooper Developments (Pegasus)	13	Promotes land off London Road Yes. The identification of specific sites for self-build development is favoured as this would have a greater chance of ensuring that the needs of local people wishing to build their own homes are met. Recommend these sites are specifically allocated as self build / custom build housing sites within the Review document. However, it is considered that if the option of requiring certain developments to provide a proportion of their site as serviced plots is pursued, then this type of development should be secured through a legal undertaking to allow a mechanism for the developer or a third party to provide and facilitate plots. In this case it is recommended that developers/third parties should work closely with the Council to actively market such sites to ensure that sufficient self and custom-build homes are provided to meet local needs.	Comments noted. This will be considered further as the Local Plan Review progresses and will be informed by a range of evidence.
SIO1592	Cooper Developments (Pegasus)	14	Promotes land off London Road Yes. Other options used by LPA's include undertaking a strategic review of land within their ownership to identify smaller plots and proactively identify sites and establish if they are suitable for self and custom build. Planning briefs could be prepared for suitable sites to provide some certainty for prospective buyers. However, it is recognised that this approach is not always suitable, as many LPAs do not have large land-holdings and there are often issues of resourcing and financial liabilities to be resolved for such an approach to work	Comments noted. This will be considered further as the Local Plan Review progresses and will be informed by a range of evidence.
SIO1593	Cooper Developments (Pegasus)	17	Promotes land off London Road Acknowledged Lichfield Centre Study published 2017 - recent. But, the LPR span 2020-2036 considered should be updated following completion of Friarsgate and other Lichfield City Centre schemes and assess impact of Mill Green Designer Outlet Village (Located CCD) under construction on Burntwood town centre. Distribution of housing growth needs first to be determined before future household expenditure can be estimated and floor space requirements determined. Once the above factors have been resolved this will then better inform the retail and office requirements for the purposes of the LPR>	Comments noted. This will be considered further as the Local Plan Review progresses.
SIO1594	Cooper Developments (Pegasus)	18	Promotes land off London Road The approach of progressing supporting Development Plan Documents for Lichfield City Centre and Burntwood Town Centre is not favoured, as a single comprehensive Local Plan is the preferred option, with this being updated at least once every 5 years, in line with national guidance.	Comments noted. The revised NPPF is due to be published summer 2018 and set out that Local Plan should be reviewed every 5 years.
SIO1595	Cooper Developments (Pegasus)	19	Promotes land off London Road It is considered that the Local Plan Review offers scope to encompass a wide range of development and as well as housing, employment and retail development should include policies and strategic allocations necessary to provide appropriate leisure, recreation, infrastructure and community facilities.	Comments noted. Infrastructure provision will be considered as part of the testing of each option.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1596	Cooper Developments (Pegasus)	20	Promotes land off London Road Understood that an update to the Infrastructure Development Plan (IDP) will be used to inform the new development strategy for the District, it is the case that the levels of housing, employment and retail growth should be determined first, in order that the types of infrastructure required can then be established	Comments noted. The District Council is committed to working with strategy providers, developers and other service providers to enable the sustainable development within the District.
SIO1597	Cooper Developments (Pegasus)	21	Promotes land off London Road Focusing the majority of growth in and around the major settlements within or adjacent to Lichfield District would bring forward benefits such as utilising existing infrastructure. This option may mean other smaller sustainable settlements and rural areas experience a decline in population with adverse impacts on levels of services and facilities. Town focused growth may lead to increasing pressure on services and facilities within those settlements and consideration should be given to the release of Green Belt sites on the edge of settlement	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1598	Cooper Developments (Pegasus)	22	Promotes land off London Road This option would have the advantage of being able to meet housing needs close to where they arise and also has the potential to deliver a wide range of housing types and tenures, as well opportunities to deliver green infrastructure and community and sporting facilities through the create of SUEs. Land off Lichfield Road would provide a suitable and deliverable site for circa 150 dwellings to meet Lichfield City's needs. Provides technical reports to demonstrate there are no major constraints to development.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1599	Cooper Developments (Pegasus)	23	Promotes land off London Road This option represents a continuation of the existing spatial strategy. Broadly supportive of this option as it is considered to be an appropriate option for delivering housing growth across the District to 2036 as it allows a greater range of sustainable sites to come forward therefore increasing housing choice for new and existing residents. Believe there is scope to consider other rural settlements where they are in close proximity to larger settlements.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1600	Cooper Developments (Pegasus)	24	Promotes land off London Road It is considered that the above settlements are entirely suitable to remain as Key rural Settlements, given that they all exhibit good levels of services and facilities, as well as accessibility to services in higher order settlements. However, it is noted that in reviewing the Local Plan there is an opportunity to update the Rural Settlement Sustainability Study which provided the evidence base for the categorisation of these settlements, to ascertain whether any changes are necessary and if there are any further settlements which should be added to this category	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1601	Cooper Developments (Pegasus)	25	Promotes land off London Road This would provide a wide range of housing choice in a number of sustainable locations ND have the opportunity of providing dwellings in locations which accord with some of the recommendations in the Birmingham Strategic Growth Study. Considered rather than a challenge the Local Plan Review affords the opportunity to re-examine settlement and Green Belt boundaries. Consideration should be given to allocating sites beyond such boundaries and these boundaries should be re-define as necessary through the review process.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1602	Cooper Developments (Pegasus)	26	Believe some growth should occur at the settlements listed at paragraph 10.3 to ensure that rural areas remain sustainable, but the focus for growth should be towards the most sustainable locations, particularly those with rail services to Birmingham. Whilst a comprehensive green belt review is welcomed, it is contended that as a matter of course this approach should extend to all other Green Belt settlements listed under Options 1 and 2.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1603	Cooper Developments (Pegasus)	27	Although this option would have the advantage of meeting housing needs where they arise and support village services and facilities, in isolation it would represent the least sustainable option. Overall combining other options with growth at some of the more sustainable smaller settlements may therefore be a more suitable spatial strategy for the District moving forwards through the review process.	Comments noted. The Local Plan Review will consider the most appropriate Spatial Strategy. This will be informed by a range of evidence.
SIO1604	Cooper Developments (Pegasus)	37	The spatial strategy needs to be consistent with the vision for the District and the strategic priorities needed to implement the vision. In retaining the vision and approach set out in the Local Plan it therefore follows that the spatial strategy encompassed within the review should focus growth to the most sustainable locations in the District with Lichfield City seeing the highest level of growth. The strategy should encompass provision for cross boundary needs, and added to those of Rugeley and Tamworth consideration should be given to the needs of the GBHMA which may result in other strategic locations being identified or growth towards villages that are capable of meeting cross boundary needs.	
SIO1605	Cooper Developments (Pegasus)	38	It is considered that the proposed IDP structure reflects that of the current Lichfield District Council IDP, and in again setting out the infrastructure requirement, the cost, funding, phasing and delivery lead, this should enable the effective articulation of infrastructure requirements associated with the Local Plan.	Comments noted: Delivery Leads and funding streams will be identified as they become apparent.

Representation Reference	Consultee/Agent	Question	Comment Summary	Officer Response
SIO1606	Cooper Developments (Pegasus)	39	<p>Council proposes to prioritise infrastructure into Critical / Essential or Important. However, neither the current NPPF, nor the Draft the NPPF advocates this approach and it is considered that it is not the role of the IDP to prioritise the delivery of infrastructure or what funds should be allocated to the delivery of that infrastructure, as these decisions will be informed by other processes, investment plans and strategies. What is key is that the Council actively engages with infrastructure providers at an early stage to ensure that the required infrastructure is delivered in a timely manner to allow development sites to come forward.</p> <p>Additionally, the IDP is a 'living' document which is subject to ongoing change and revision, therefore whatever is considered to be a critical piece of infrastructure at any given time may change, particularly if some developments do not come forward in the timescales predicted in the Local Plan. There therefore needs to be an element of flexibility within the IDP and it is considered that prioritising infrastructure in this way would not assist in this.</p>	<p>Whilst it is noted that prioritisation is not a requirements the District Council operates a CIL charge, prioritisation within the IDP will enable the informed distribution of funds and the development of a programme of needs across the plan period enabling a process that supports delivery of appropriate requirements which address evidenced need. As the IDP is reviewed the status of project prioritisation will also be revisited.</p>
SIO1607	Cooper Developments (Pegasus)	40	<p>The prioritisation of infrastructure is not considered to be the role of the IDP and thus the identified prioritisation categories and their definition is not considered relevant.</p>	<p>Whilst it is noted that prioritisation is not a requirements the District Council operates a CIL charge, prioritisation within the IDP will enable the informed distribution of funds and the development of a programme of needs across the plan period enabling a process that supports delivery of appropriate requirements which address evidenced need. As the IDP is reviewed the status of project prioritisation will also be revisited.</p>
SIO1608	Cooper Developments (Pegasus)	41	<p>Several pieces of evidence need updating and these comments are also relevant in response to this question.</p>	<p>Comments noted</p>
SIO1609	Cooper Developments (Pegasus)	43	<p>The draft NPPF sets out that plans should be shaped by early, proportionate and meaningful engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and statutory consultees. The Council has set out a proposed stakeholder engagement process which identifies a set of actions through which focused engagement can be undertaken. It is considered that this process should result in the identification of infrastructure requirements and enable the delivery of those requirements.</p>	<p>Comments noted</p>
SIO1610	Smith Bros (Pegasus)	1	<p>Yes appropriate. Note Plan due adoption 2020 and plan period 2020-2036 16 timeframe. Appropriate and in line with NPPF Para 157. Reiterated in draft NPPF - minimum 15 years. 2036 ties in with GBHMA SGS Feb2018. Should be committed to review every five year as per NPPF para23.</p>	<p>Comments noted</p>

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ECONOMIC GROWTH, ENVIRONMENT AND DEVELOPMENT (OVERVIEW AND SCRUTINY) COMMITTEE WORK PROGRAMME FOR 2018-19

Item	June	Sept	Nov	Jan	Mar	Details/Reasons	Officer	Member Lead
Policy Development								
Terms of Reference	✓						Christine Lewis	
Small Business Grant Scheme		✓					Jonathan Percival	Cllr Ian Pritchard
Environment Agency		✓				Presentation and discussion with EA regarding Planning application representations	Craig Jordan	Cllr Ian Pritchard
Conservation Area Appraisals			✓			To consider Wall and Wiggington (including changes to the CA boundaries) and the new CA is proposed for Drayton Bassett	Sean Coghlan	Cllr Ian Pritchard

ECONOMIC GROWTH, ENVIRONMENT AND DEVELOPMENT (OVERVIEW AND SCRUTINY) COMMITTEE WORK PROGRAMME FOR 2018-19

Item	June	Sept	Nov	Jan	Mar	Details/Reasons	Officer	Member Lead
LEPs/Economic Development Performance			✓				Craig Jordan	Cllr Ian Pritchard
Supplementary Planning Document on Sustainable Design			✓				Ashley Baldwin	Cllr Ian Pritchard
Festivals and Events					✓	This item will be led by LPWM to scope. EGED will consider tourism and economic matters	Lisa Clemson	Cllr Ian Pritchard
Building Control Shared Service						A briefing paper will be sent when information is ready	Ged Cooper	Cllr Ian Pritchard
Local Plan Updates	✓	✓		✓	✓	Reports on progress with the Local Plan, neighbourhood plans	Ashley Baldwin	Cllr Ian Pritchard

ECONOMIC GROWTH, ENVIRONMENT AND DEVELOPMENT (OVERVIEW AND SCRUTINY) COMMITTEE WORK PROGRAMME FOR 2018-19

Item	June	Sept	Nov	Jan	Mar	Details/Reasons	Officer	Member Lead
BRS Working Group		✓	✓	✓	✓	Working group to be established	Craig Jordan	Cllr Ian Pritchard
Review of the operation of the new Planning Committee						Report likely in June 2019 to allow a full year of operation before review.	Sean Coghlan	Cllr Ian Pritchard
Briefing paper on Development Management performance		✓					Sean Coghlan	Cllr Ian Pritchard
Briefing paper on performance of self builds		✓						
Effectiveness of Enforcement						To consider enforcement activity	Sean Coghlan	Cllr Ian Pritchard

ECONOMIC GROWTH, ENVIRONMENT AND DEVELOPMENT (OVERVIEW AND SCRUTINY) COMMITTEE WORK PROGRAMME FOR 2018-19

Item	June	Sept	Nov	Jan	Mar	Details/Reasons	Officer	Member Lead
Economic Development Performance						To consider the benefits of the service	Craig Jordan	Cllr Ian Pritchard